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# Feasibility and Plan of Operation Report for a Hazardous Waste Storage Facility

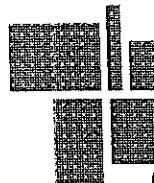
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September 1994

*Submitted by:*  
EOG Disposal, Inc.  
Milwaukee, Wisconsin

*Prepared by:*  
RMT, Inc.  
Waukesha, Wisconsin

VOLUME I







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EOG Disposal, Inc.

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September 6, 1994

Mr. Patrick Brady, P.E.  
Wisconsin Department of Natural Resources  
Southeast District  
4041 North Richards Street  
Milwaukee, Wisconsin 53212

Re: Feasibility Study and Plan of Operation  
EOG Disposal, Inc.  
EPA ID #WID988580056

Dear Mr. Brady,

EOG operates a solid waste transfer and processing facility and a hazardous waste storage facility for a select group of waste codes. In 1990, EOG received authorization from the Wisconsin Department of Natural Resources (WDNR) to operate a solid waste transfer and storage facility. The solid wastes are wastes from six general categories which include off-specification and used chemicals, oils, coolants, cleaning solutions, wastewater and paints.

As a result of Wisconsin's incorporation of the Toxic Characteristic Leaching Procedure (TCLP) in 1992, some of the nonhazardous waste streams handled by EOG were classified as hazardous waste. EOG submitted an interim status application to the WDNR in December, 1992, so they would continue to handle these wastes. On March 15, 1994, the WDNR granted EOG Interim Status to accept the following wastes:

1. Materials that EOG was authorized to accept prior to the promulgation of the TCLP regulations.
2. materials which are hazardous waste only because of the implementation of TCLP regulations, and
3. materials that are not considered to be hazardous waste by the federal government but are considered to be hazardous waste by the state.

EOG is eligible to accept hazardous wastes with the following waste codes; D012 Endrin; D013 Lindane; D014 Methoxychlor; D015 Toxaphene; D016 2,4-D; D018 Benzene; D019 Carbon Tetrachloride; D020 Chlordane; D021 Chlorobenzene; D022 Chloroform; D023 o-Cresol; D024 m-Cresol; D025 p-Cresol; D025 Cresol; D029 1,4-Dichlorobenzene; D028 1,2-Dichloroethane; D029 1,1-Dichloroethylene; D030 2,4-Dinitrotoluene; D032 Hexachlorobenzene; D033 Hexachlorobutadiene; D034 Hexachloroethane; D035 Methyl Ethyl Ketone; D036 Nitrobenzene; D037 Pentachlorophenol; D038 Pyridine; D039 Tetrachloroethylene; D040 Trichloroethylene; D041 2,4,5-Trichlorophenol; D042 2,4,6-Trichlorophenol; and D043 Vinyl Chloride.

As part of the Interim Status approval, EOG is required to prepare and submit a feasibility study report/plan of operation within 180 days of the approval. This submittal contains the feasibility study report/plan of operation pursuant to the requirements of chapters NR 600-685, WAC. This document provides for the continuation of the approved interim status hazardous waste management activities as well as an expanded operation.







Mr. Patrick Brady  
September 6, 1994  
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EOG currently has a capacity to store 1,440 drums of waste (nonhazardous) or 720 drums of hazardous waste within their existing building as shown on the Interim Status permit and two above ground storage tanks of waste (nonhazardous) as shown in the Solid Waste permit. To more responsively meet the waste disposal needs of EOG's clientele, it is EOG's intention to expand the number of waste codes and wastestreams accepted, as well as to expand the overall storage capacity of the operation. The basic purpose of the facility will not change, which is to redirect waste streams for beneficial reuse whenever possible. Changes to the existing operation will include:

1. The addition of additional storage capacity of containers through an expansion of the existing warehouse.
2. The construction and operation of a small exterior bulk tank farm and bulk tanker loading/unloading area.
3. The construction and operation of a new separate building for the safe repackaging and bulking of lab pack materials and tanks for the consolidation of acids and consolidation of bases.
4. Relocation of EOG's administrative offices from the existing building to an adjacent building to the northeast.

EOG will continue to operate according to the provisions of the interim status license during the review and approval period of this submittal. Upon receiving WDNR approval, EOG will prepare construction drawings/specifications for the expanded facility and initiate construction as soon as possible. Upon completion of construction, a construction certification report will be prepared and submitted to WDNR for approval and issuance of an operating license.

This permit application addresses both solid and hazardous wastes. As part of the existing Solid Waste Permit, EOG can store hazardous wastes for a maximum of 90 days. Once the hazardous waste operating license is approved for storage of hazardous waste, EOG will be able to store both solid and hazardous wastes for a period of greater than 90 days. The closure costs also include the costs associated with both the solid and hazardous waste permits.

EOG has determined that an evaluation for the need of an Air Permit is warranted as part of the proposed activities at their facility. Currently, EOG is evaluating the estimated emission rates of air pollutants regulated under Chapter NR 400 - 499, Wisconsin Administrative Code. If this evaluation leads to a need of an air permit, EOG will prepare and submit an air permit to the WDNR Bureau of Air Management, Permit Section under a separate cover letter.

If you have any questions concerning this submittal, please contact me at (414) 353-1156.

Sincerely,

EOG DISPOSAL, INC.

Michael C. Vilione, President  
VK Investments (Owner)

MCV/rjs



CHECK LIST

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ITEM	COMPLETE (Y/N)	TECHNICALLY ADEQUATE (Y/N)	SEE ATTACHED COMMENT	SEE ATTACHED EXHIBIT	LOCATION OF INFORMATION/COMMENTS
<b>GENERAL REPORT AND PLAN SUBMITTAL REQUIREMENTS NR 680.05</b>					
1) Unless otherwise specified, all submittals must include the following:	Y				
a) Review fees.	Y				Front of Plan
b) Cover letter.	Y				Front of Plan
c) Number of copies (two copies to appropriate district or area office and three copies to Bureau of Solid and Hazardous Waste Management).	Y				
1. P.E. Certification	Y				Attachment 14
2. Technical procedures as specified by ASTM, USGS or other equivalent or appropriate methods approved by the department.	Y				
4. Maps, drawings, photographs, tables, plan sheets, and other visuals presented in the format as follows:	Y				
a. Appropriate scale for sufficient clarity.	Y				
b. Numbering, referencing, titles, legends, horizontal and vertical scales where applicable, and drafting or origination dates.	Y				
c <sub>1</sub> . Uniform scales as much as possible.	Y				
c <sub>2</sub> . North arrow.	Y				
d. USGS data as a basis for all elevations.	Y				
e. Plan sheets showing site construction, operation or closure topography shall also show original topography.	Y				
f. Plan sheets for hazardous waste facilities shall indicate a survey grid.	Y				
g. Plan sheets shall be no smaller than 24" x 36". All other documents must be no larger than 24" x 36" and no smaller than 8 1/2" x 11".	Y				
h. All cross-sections shall show survey grid location and be referenced on plan sheets.	Y				
5. Table of Contents listing all sections of the submittal.	Y				Front of Plan
6. Appendix listing names of all references, data, procedures and calculations.	Y				After each Attachment, if appropriate



ITEM	COMPLETE (Y/N)	TECHNICALLY ADEQUATE (Y/N)	SEE ATTACHED COMMENT	SEE ATTACHED EXHIBIT	LOCATION OF INFORMATION/COMMENTS
(2) Signatories to reports.	Y				Attachment 14
<b>GENERAL REQUIREMENTS NR 800.00(3)</b>					
1. a. General facility description and Part A application completed with the most recent information.	Y				Attachment 1, Section 2
b. Chemical and physical analyses of hazardous waste.	Y				Attachment 5
c. Waste analysis plan as required by NR 830.13(1).	Y				Attachment 5
d. A description of the security procedures and equipment required by NR 830.14	Y				Attachment 3, Section 2.4
e. General inspection schedule required by NR 830.15(2).	Y				Attachment 8
f. A description of the procedures, structures or equipment used to:					
1) Prevent hazards in unloading operations	Y				Attachment 8, Section 7
2) Prevent runoff from hazardous waste areas or to prevent flooding from these areas	Y				Attachment 8, Section 9
3) Prevent contamination of water supplies	Y				Attachment 8, Section 11
4) Mitigate effects of equipment failure and power outages	Y				Attachment 8, Section 8
5) Prevent undue exposure of personnel to hazardous waste	Y				Attachment 8, Section 10
g. A description of precautions to prevent accidental ignition or reaction of ignitable, reactive or incompatible wastes to be in compliance with NR 830.17.	Y				Attachment 8, Section 12 Attachment 9, Section 4.10
h. A description of vicinity and site traffic patterns.	Y				Attachment 3, Section 5
i. Facility location information:	Y				Attachment 3
1) Identification of whether the facility is located within a 100-year floodplain.	Y				Attachment 3, Section 4.1
2) If the facility is located in a 100-year floodplain, the following is provided.....	N/A				N/A - The EOG facility is not located within a 100-year floodplain.
j. An outline of the introductory and training programs required by NR 830.18 and a brief description of how training is designed to meet actual job tasks required by NR 830.18(1)(b).	Y				Attachment 10
k. For facilities where hazardous waste was disposed of before the submittal of the feasibility report.....	N/A				N/A - EOG has not and will not dispose of any hazardous wastes on site.
l. An existing site condition topographic plan sheet which meets the requirements of NR 860.09(2).	Y				Attachment 15, Sheet 3 of 18
<b>FACILITY SPECIFIC REQUIREMENTS NR 800.00(4)</b>					





ITEM	COMPLETE (Y/N)	TECHNICALLY ADEQUATE (Y/N)	SEE ATTACHED COMMENT	SEE ATTACHED EXHIBIT	LOCATION OF INFORMATION/COMMENTS
a. The feasibility and plan of operation report requirements of NR 840.08 and other requirements of NR 840 for containers.	Y				See below
b. The feasibility and plan of operation report requirements of NR 845.08 and other requirements of NR 845 for tank systems.	Y				See below
c. The feasibility and plan of operation report requirements of NR 855.08 and other requirements of NR 855 for waste piles.	N/A				N/A - EOG operations will not include the storing hazardous wastes in waste piles.
d. The feasibility and plan of operation report requirements of NR 865.08 and other requirements of NR 865 for incinerators.	N/A				N/A - EOG operations will not include incineration activities.
e. The feasibility and plan of operation report requirements of NR 870.08 and other requirements of NR 870 for miscellaneous units.	N/A				N/A - EOG operations include storage of hazardous waste in containers and aboveground tanks only.
<b>LANDFILL AND SURFACE IMPOUNDMENT REQUIREMENTS NR 880.08(5)</b>	N/A				N/A - EOG operations will not include storing hazardous wastes in surface impoundments.
<b>ENVIRONMENTAL REVIEW NR 880.08(6)</b>					
a. Project summary including:	Y				
1. The purpose and need for the proposed project.	Y				Attachment 3, Section 1.1 of Appendix E
2. A listing of the statutory authority and other relevant local, state and federal permits or approvals required and a discussion of the need for exemptions, zoning changes and any other special permits.	Y				Attachment 3, Section 1.2 of Appendix E
3. Estimated cost and funding source for the project.	Y				Attachment 3, Section 1.3 of Appendix E
b. Proposed physical changes discussion including:	Y				Attachment 3, Section 2 of Appendix E
1. Changes in terrestrial resources.	Y				Attachment 3, Section 2.1 of Appendix E
2. Changes in aquatic resources.	Y				Attachment 3, Section 2.2 of Appendix E
3. Buildings, treatment units, roads and other structures to be constructed in conjunction with the facility.	Y				Attachment 3, Section 2.3 of Appendix E
4. Emissions and discharges associated with facility preparation, construction, operation, closure and following closure of the facility.	Y				Attachment 3, Section 2.4 of Appendix E
5. Other changes anticipated with facility development.	Y				Attachment 3, Section 2.5 of Appendix E
6. Maps, plans and other descriptive materials.	Y				Attachment 3, Appendix E
c. Existing environment discussion including:	Y				Attachment 3, Section 3 of Appendix E
1. Description of the regional physical environment.	Y				Attachment 3, Section 3.1 of Appendix E



ITEM	COMPLETE (Y/N)	TECHNICALLY ADEQUATE (Y/N)	SEE ATTACHED COMMENT	SEE ATTACHED EXHIBIT	LOCATION OF INFORMATION/COMMENTS
2. Dominant aquatic and terrestrial plant and animal species and habitats found in the area.	Y				Attachment 3, Section 3.2 of Appendix E
3. Land use.	Y				Attachment 3, Section 3.3 of Appendix E
4. Social and economic conditions.	Y				Attachment 3, Section 3.4 of Appendix E
5. Other special resources.	Y				Attachment 3, Section 3.5 of Appendix E
d. Environmental consequences discussion including:	Y				Attachment 3, Section 4 of Appendix E
1. Physical impacts associated with facility design, construction and operation.	Y				Attachment 3, Section 4.1 of Appendix E
2. Biological impacts.	Y				Attachment 3, Section 4.2 of Appendix E
3. Impacts on land use.	Y				Attachment 3, Section 4.3 of Appendix E
4. Social and economic impacts to local residents and cultural groups as well as communities and industries served by the facility.	Y				Attachment 3, Section 4.4 of Appendix E
5. Other special resources.	Y				Attachment 3, Section 4.5 of Appendix E
6. Probable adverse impacts that cannot be avoided.	Y				Attachment 3, Section 4.6 of Appendix E
e. Alternatives.	Y				Attachment 3, Section 5 of Appendix E
SMALL STORAGE FACILITIES NR 840.06(7)	N/A				N/A - Hazardous waste storage will exceed 10,000 gallons at any time.
NEEDS NR 840.06(8)	Y				Attachment 2
THE FEASIBILITY REPORT MUST INCLUDE A NARRATIVE CONTAINING THE FOLLOWING INFORMATION. NR 840.06(1)	Y				A facility can make a single Feasibility and Plan of Operation Report submittal. If this is done, then the requirements of NR 840.06(1) and NR 845.06(1) must be addressed in that submittal.
(a) A narrative describing:	Y				Attachments 2,3,7,8,9,10,11 and 15
1. A legal description of the site.	Y				Attachment 3, Section 2.3
2. Present ownership of the site.	Y				Attachment 3, Section 1
3. Proposed site size and boundaries and present land use of the site and the area within 0.5 miles of the site. Particular note must be made of parks, hospitals, nursing homes and areas of archeological and historical significance.	Y				Attachment 3, Section 2.2
4. Area served, including population and major industries.	Y				Attachment 3, Section 1 Attachment 2, Section 3



ITEM	COMPLETE (Y/N)	TECHNICALLY ADEQUATE (Y/N)	SEE ATTACHED COMMENT	SEE ATTACHED EXHIBIT	LOCATION OF INFORMATION/COMMENTS
5. A complete material balance for the facility, specifying the amounts and characteristics of hazardous waste to be received and the amounts and characteristics of products and wastes which will be generated by the facility.	Y				Attachment 3, Section 7.1
6. Types of vehicles and access routes used to transport hazardous waste into and out of the facility including an analysis of estimated traffic flow pattern on access routes and within the facility and an analysis of increased quantities of traffic on access routes into and out of the facility.	Y				Attachment 3, Section 5
7. Estimated quantities and characteristics of wastes resulting from facility operations and methods of treatment or disposal.	Y				Attachment 3, Section 7
8. Persons responsible for plant construction and operation.	Y				Attachment 3, Section 8 and Attachment 9
9. Quality and quantity of air discharge from facility operations.	Y				Attachment 3, Section 10.1
10. Appurtenances and procedures for the storage of hazardous wastes beyond the end of the processing day, for the control of dust, odors, fire, windblown materials and potential explosions and for the handling of hazardous waste in case of a major treatment facility breakdown.	Y				Attachment 7 Attachment 8
11. Names and locations of all hazardous and solid waste disposal sites and facilities at which at which hazardous and solid wastes from the treatment plant will be disposed.	Y				Attachment 3, Section 7
12. Overall site or facility layout including conceptual building design, sizing of receiving areas, methods of processing, and sizing of major process equipment or process areas.	Y				Attachment 7 Attachment 8
13. A timetable for site or facility construction, start-up and operation.	Y				Attachment 3, Section 8
14. The operating schedule.	Y				Attachment 3, Section 9
15. The provisions for protection of groundwater and surface waters during site or facility construction and operation.	Y				Attachment 8, Section 11
16. A conceptual design of equipment indicating its capacity and dimensions.	Y				Attachment 7
17. The potential for the site to meet the location requirements in NR 830.18.	Y				Attachment 3, Section 4
(b) Regional Information, including:	Y				Attachment 3
1. Topography, including predominant topographic features.	Y				Attachment 3, Section 2
2. Hydrology, including surface water drainage patterns and significant hydrologic features such as surface waters, springs, drainage basins and divides and wetlands.	Y				Attachment 3, Sections 2 and 4
3. Geology, including the nature and distribution of bedrock and unconsolidated deposits.	Y				Attachment 3, Section 6



ITEM	COMPLETE (Y/N)	TECHNICALLY ADEQUATE (Y/N)	SEE ATTACHED COMMENT	SEE ATTACHED EXHIBIT	LOCATION OF INFORMATION/COMMENTS
4. Hydrogeology, including depth to groundwater, groundwater flow direction, recharge and discharge areas, groundwater divides, aquifers and the identification of the aquifers used by public and private wells beneath the facility property within 0.5 miles of the proposed site, unless a demonstration is made indicating why the information is not needed.	Y				Attachment 3, Section 6
5. Ground and surface water quality as described in available regional literature.	Y				Attachment 3, Section 6.3
6. Climatology.	Y				Attachment 3, Section 3
7. Identification of adjacent landowners.	Y				Attachment 3, Section 2.2
8. Zoning.	Y				Attachment 3, Section 2
9. Present land use with particular emphasis on known recreational, historic or archeological areas.	Y				Attachment 3, Section 2
10. A plat map indicating property boundaries and adjacent landowners.	Y				Attachment 15, Sheet 5 of 18
(c) An existing and proposed site conditions topographic plan within 1500 feet of the facility and a minimum scale of one inch = 200 feet with a maximum 2-foot contour interval. All elevations shall be related to USGS data. More than one plan sheet can be prepared to show the required information if one sheet will be too detailed to be clear. The plan or plans shall clearly show:	Y				Attachment 15, Sheet 3 of 18
1. 100-year floodplain area.	Y				Attachment 15, Sheet 7 of 18
2. Surface waters, including wetlands and intermittent streams.	Y				Attachment 15, Sheet 7 of 18
3. Homes, buildings, man-made features and utility lines.	Y				Attachment 15, Sheet 3 of 18
4. Surrounding land uses, such as residential, commercial, agricultural and recreational.	Y				Attachment 15, Sheet 6 of 18
5. Property boundaries, facility or waste management boundaries, including any previous solid or hazardous waste disposal areas.	Y				Attachment 15, Sheet 3 of 18
6. Access control, such as fences and gates.	Y				Attachment 15, Sheet 2 of 18
7. Water supply wells and any other wells, such as irrigation wells.	Y				Attachment 15, Sheet 3 of 18
8. Well boring locations and observation well locations.	N/A				N/A
9. A windrose, which shows prevailing wind speed and direction.	Y				Attachment 3, Figure 1
10. Buildings, treatment, storage or disposal operations or other structures such as recreation areas, runoff control systems, access and internal roads, storm, sanitary, and process sewerage systems, loading and unloading areas, fire control facilities.	Y				Attachment 15, Sheet 3 of 18
11. Barriers for drainage or flood control.	Y				Attachment 15, Sheet 3 of 18





ITEM	COMPLETE (Y/N)	TECHNICALLY ADEQUATE (Y/N)	SEE ATTACHED COMMENT	SEE ATTACHED EXHIBIT	LOCATION OF INFORMATION/COMMENTS
12. Location of operational units within the facility where hazardous waste is or will be treated or stored, including equipment cleanup areas.	Y				Attachment 15, Sheet 3 of 18
(d) Maps and plans to supplement the narrative in (a).	Y				Attachment 15
1. A USGS, 7-1/2 minute, topographic quadrangle map. The map must show sources of waste for a minimum of 3 miles.	N/A				N/A - Because EOG has a national market, this item was omitted from this submittal. A list of typical clientele can be found in Attachment 2, Table 1.
2. A plat map showing property boundaries and zoning within 1/2 mile of the facility and traffic routes within 2 miles of the facility.	Y				Attachment 15, Sheet 5 of 18
3. An existing site conditions map showing the proposed site boundary, property lines, easements and rights-of-way, buildings, foundations, roads, utilities and other structures, topography, wooded areas, locations of soil borings and test pits, features of historical and archeological significance, and other physical site features as appropriate.	Y				Attachment 15, Sheet 3
4. A proposed facility plan showing access roads and traffic patterns, buildings, scales, utility lines, drainage diversion, screening, means of access control, final topography, areas to be cleared of vegetation and other design features.	Y				Attachment 15, Sheet 2 of 18
(e) Hazardous constituents. If the presence of hazardous waste constituents has been detected in the groundwater at the point of standards application at the time of feasibility and plan of operation report submittal....the owner must submit an engineering feasibility plan for a corrective action program....	N/A				N/A
(f) Design constraints. Recommendations on design constraints for development of the site considering all available data and reasons for the recommendations.	Y				Attachment 7
(g) Engineering plans.					
1. Title Sheet.	Y				Attachment 15 - 8 1/2 x 11 Index page
2. Final site topography.	Y				Attachment 15, Sheet 2 of 18
(h) Plan sheets.					
1. A survey grid.	Y				Attachment 15, Sheet 3 of 18
2. All drainage patterns and surface water drainage control structures both within the actual fill area and at the site perimeter.	Y				Attachment 15, Sheet 1 of 18
3. Ground surface contours at the time represented by the drawing. Spot elevations for key features.	Y				Attachment 15, Sheets 1 of 18 and 3 of 18
4. Access roads and traffic flow patterns within the facility.	Y				Attachment 15, Sheet 2 of 18
5. All temporary and permanent fencing.	Y				Attachment 15, Sheet 2 of 18
6. Methods of screening such as berms, vegetation or special fencing.	Y				Attachment 15, Sheet 2 of 18



ITEM	COMPLETE (Y/N)	TECHNICALLY ADEQUATE (Y/N)	SEE ATTACHED COMMENT	SEE ATTACHED EXHIBIT	LOCATION OF INFORMATION/COMMENTS
7. Groundwater monitoring devices and detection systems.	N/A				N/A
8. Support buildings, scale, utilities, gates and signs.	Y				Attachment 15, Sheet 2 of 18
9. Special waste handling areas.	Y				Attachment 15, Sheet 2 of 18
10. Construction notes and references to details.	Y				Attachments 8 and 15
11. Other appropriate site features.	Y				Attachment 15
<b>THE FEASIBILITY REPORT FOR HAZARDOUS WASTE CONTAINER STORAGE FACILITIES MUST INCLUDE A NARRATIVE CONTAINING THE FOLLOWING INFORMATION: NR 640.06(2)</b>					
(a) A description of the containment system to demonstrate compliance with NR 640.13, including:	Y				Attachment 7 Attachment 8
1. Basic design parameters, dimensions and materials of construction.	Y				Attachment 7, Section 2
2. How the design promotes drainage or how containers are kept from contact with standing liquids in the containment system.	Y				Attachment 8, Section 8
3. Capacity of the containment system relative to the number and volume of the containers.	Y				Attachment 8, Appendix A
4. Provisions for preventing and managing run-on.	Y				Attachment 8, Section 9
5. How accumulated liquids can be analyzed and removed to prevent overflow.	Y				Attachment 7, Section 2 Attachment 8
(b) A description of how NR 630.17(2) shall be complied with to meet the requirements of NR 640.10 (compatibility of waste with containers) and NR 640.15(2) (special requirements for incompatible wastes).	Y				Attachment 8, Section 12
(c) Sketches, drawings or data demonstrating compliance with the buffer zone requirements of NR 640.14 (special requirements for ignitable or reactive waste) and NR 640.115(1) (special requirements for incompatible wastes).	Y				Attachment 15, Sheet 2 of 18
(d) Operations and maintenance manual consisting of the following:	Y				Attachment 7, Section 2
1. Identification of the project.	Y				Attachment 7, Section 1
2. Specifications for site construction and operation.	Y				Attachment 7, Section 2
3. A description of daily operations.	Y				Attachment 7, Section 2 and Attachment 8
(e) Design Report, including:					
1. A discussion of the reasoning and logic behind the design of the major features of the site.	Y				Attachment 7, Section 2



ITEM	COMPLETE (Y/N)	TECHNICALLY ADEQUATE (Y/N)	SEE ATTACHED COMMENT	SEE ATTACHED EXHIBIT	LOCATION OF INFORMATION/COMMENTS
2. A closure plan as required by NR 640.16 and NR 685.05.	Y				Attachment 11
a. Description of how facility is to be closed.	Y				Attachment 11, Sections 3, 4 and 5
b. A description of possible land uses after closure.	Y				Attachment 11, Section 11
c. Anticipated time until closing, the estimated time for closure, and any anticipated partial closures.	Y				Attachment 11, Section 9
d. Estimate of maximum waste inventory.	Y				Attachment 11, Section 2
e. A description of decontamination procedures.	Y				Attachment 11, Sections 4 and 8
3. A detailed analysis in accordance with NR 685.07 of financial responsibility for closure from the time of facility closure to termination.	Y				Attachment 11, Section 10 and Attachment 12
(f) A contingency plan as specified in NR 630.21 and NR 630.22(1) and (2).	Y				Attachment 9
1. Names, positions, addresses and phone numbers of all persons qualified to act as emergency coordinator.	Y				Attachment 9, Section 3
2. Description of facility layout, types and characteristics of wastes handled, work areas and entrances to the facility.	Y				Attachment 7 and Attachment 9, Sections 1.1, 6.1 and 5
3. Evacuation plan.	Y				Attachment 9, Section 8
4. Procedures for emergency shutdown of facility operations.	Y				Attachment 9, Section 6
5. Emergency notification procedures.	Y				Attachment 9, Section 4
6. Listing, description and location of emergency equipment.	Y				Attachment 9, Section 5
(g) An appendix which shall include any additional data not previously presented, calculations, material specifications, operating agreements and other appropriate information.	Y				Following each Attachment, if appropriate.
<b>THE FEASIBILITY REPORT MUST INCLUDE A NARRATIVE CONTAINING THE FOLLOWING INFORMATION. NR 645.06(1)</b>	Y				A facility can make a single Feasibility and Plan of Operation Report submittal. If this is done, then the requirements of NR 640.06(1) and NR 645.06(1) must be addressed in that submittal.
(a) A narrative describing:	Y				Attachments 2,3,7,8,9,10,11 and 15
1. A legal description of the site.	Y				Attachment 3, Section 2.3
2. Present ownership of the site.	Y				Attachment 3, Section 1
3. Proposed site size and boundaries and present land use of the site and the area within 0.5 miles of the site. Particular note must be made of parks, hospitals, nursing homes and areas of archeological and historical significance.	Y				Attachment 3, Section 2.2



ITEM	COMPLETE (Y/N)	TECHNICALLY ADEQUATE (Y/N)	SEE ATTACHED COMMENT	SEE ATTACHED EXHIBIT	LOCATION OF INFORMATION/COMMENTS
4. Area served, including population and major industries.	Y				Attachment 3, Section 1 Attachment 2, Section 3
5. A complete material balance for the facility, specifying the amounts and characteristics of hazardous waste to be received and the amounts and characteristics of products and wastes which will be generated by the facility.	Y				Attachment 3, Section 7.1
6. Types of vehicles and access routes used to transport hazardous waste into and out of the facility including and analysis of estimated traffic flow pattern on access routes and within the facility and an analysis of increased quantities of traffic on access routes into and out of the facility.	Y				Attachment 3, Section 5
7. Estimated quantities and characteristics of wastes resulting from facility operations and methods of treatment or disposal.	Y				Attachment 3, Section 7
8. Persons responsible for plant construction and operation.	Y				Attachment 3, Section 8 and Attachment 9
9. Quality and quantity of air discharge from facility operations.	Y				Attachment 3, Section 10.1
10. Appurtenances and procedures for the storage of hazardous wastes beyond the end of the processing day, for the control of dust, odors, fire, windblown materials and potential explosions and for the handling of hazardous waste in case of a major treatment facility breakdown.	Y				Attachment 7 Attachment 8
11. Names and locations of all hazardous and solid waste disposal sites and facilities at which at which hazardous and solid wastes from the treatment plant will be disposed.	Y				Attachment 3, Section 7
12. Overall site or facility layout including conceptual building design, sizing of receiving areas, methods of processing, and sizing of major process equipment or process areas.	Y				Attachment 7 Attachment 8
13. A timetable for site or facility construction, start-up and operation.	Y				Attachment 3, Section 9
14. The operating schedule.	Y				Attachment 3, Section 9
15. The provisions for protection of groundwater and surface waters during site or facility construction and operation.	Y				Attachment 8, Section 11
16. A conceptual design of equipment indicating its capacity and dimensions.	Y				Attachment 7
17. The potential for the site to meet the location requirements in NR 830.18.	Y				Attachment 3, Section 4
(b) Regional information, including:	Y				Attachment 3
1. Topography, including predominant topographic features.	Y				Attachment 3, Section 2
2. Hydrology, including surface water drainage patterns and significant hydrologic features such as surface waters, springs, drainage basins and divides and wetlands.	Y				Attachment 3, Sections 2 and 4





ITEM	COMPLETE (Y/N)	TECHNICALLY ADEQUATE (Y/N)	SEE ATTACHED COMMENT	SEE ATTACHED EXHIBIT	LOCATION OF INFORMATION/COMMENTS
3. Geology, including the nature and distribution of bedrock and unconsolidated deposits.	Y				Attachment 3, Section 8
4. Hydrogeology, including depth to groundwater, groundwater flow direction, recharge and discharge areas, groundwater divides, aquifers and the identification of the aquifers used by public and private wells beneath the facility property within 0.5 miles of the proposed site, unless a demonstration is made indicating why the information is not needed.	Y				Attachment 3, Section 6
5. Ground and surface water quality as described in available regional literature.	Y				Attachment 3, Section 6.3
6. Climatology.	Y				Attachment 3, Section 3
7. Identification of adjacent landowners.	Y				Attachment 3, Section 2.2
8. Zoning.	Y				Attachment 3, Section 2
9. Present land use with particular emphasis on known recreational, historic or archeological areas.	Y				Attachment 3, Section 2
10. A plat map indicating property boundaries and adjacent landowners.	Y				Attachment 15, Sheet 5 of 18
(c) An existing and proposed site conditions topographic plan within 1500 feet of the facility and a minimum scale of one inch = 200 feet with a maximum 2-foot contour interval. All elevations shall be related to USGS data. More than one plan sheet can be prepared to show the required information if one sheet will be too detailed to be clear. The plan or plans shall clearly show:	Y				Attachment 15, Sheet 3 of 18
1. 100-year floodplain area.	Y				Attachment 15, Sheet 7 of 18
2. Surface waters, including wetlands and intermittent streams.	Y				Attachment 15, Sheet 7 of 18
3. Homes, buildings, man-made features and utility lines.	Y				Attachment 15, Sheet 3 of 18
4. Surrounding land uses, such as residential, commercial, agricultural and recreational and wooded areas.	Y				Attachment 15, Sheet 6 of 18
5. Proposed site boundary.	Y				Attachment 15, Sheet 2 of 18
6. Property boundaries, facility or waste management boundaries, including any previous solid or hazardous waste disposal areas.	Y				Attachment 15, Sheet 3 of 18
7. Access control, such as fences and gates.	Y				Attachment 15, Sheet 2 of 18
8. Water supply wells and any other wells, such as irrigation wells.	Y				Attachment 15, Sheet 3 of 18
9. Well boring locations and observation well locations.	N/A				N/A
10. Location of soil borings and test pits.	N/A				N/A



ITEM	COMPLETE (Y/N)	TECHNICALLY ADEQUATE (Y/N)	SEE ATTACHED COMMENT	SEE ATTACHED EXHIBIT	LOCATION OF INFORMATION/COMMENTS
11. A windrose, which shows prevailing wind speed and direction.	Y				Attachment 3, Figure 1
12. Buildings, treatment, storage or disposal operations or other structures such as recreation areas, runoff control systems, access and internal roads, storm, sanitary, and process sewerage systems, loading and unloading areas, fire control facilities.	Y				Attachment 15, Sheet 3 of 18
13. Barriers for drainage or flood control.	Y				Attachment 15, Sheet 3 of 18
14. Features of historical and archeological significance.	Y				Attachment 3, Section 4.5
15. Location of operational units within the facility where hazardous waste is or will be treated or stored, including equipment cleanup areas.	Y				Attachment 15, Sheet 3 of 18
(d) Maps and plans to supplement the narrative in (a).	Y				Attachment 15
1. A USGS, 7-1/2 minute, topographic quadrangle map. The map must show sources of waste for a minimum of 3 miles.	N/A				N/A - Because EOG has a national market, this item was omitted from this submittal. A list of typical clientele can be found in Attachment 2, Table 1.
2. A plat map showing property boundaries and zoning within 1/4 mile of the facility and traffic routes within 2 miles of the facility.	Y				Attachment 15, Sheet 5 of 18
3. A proposed facility plan showing access roads and traffic patterns, buildings, scales, utility lines, drainage diversion, screening, means of access control, final topography, areas to be cleared of vegetation and other design features.	Y				Attachment 15, Sheet 2 of 18
(e) Hazardous constituents. If the presence of hazardous waste constituents has been detected in the groundwater at the point of standards application at the time of feasibility and plan of operation report submittal....the owner must submit an engineering feasibility plan for a corrective action program....	N/A				N/A
(f) Design constraints. Recommendations on design constraints for development of the site considering all available data and reasons for the recommendations.	Y				Attachment 7
(g) Engineering plans.					
1. Title Sheet.	Y				Attachment 15 - 8 1/2 x 11 Index page
2. Final site topography.	Y				Attachment 15, Sheet 2 of 18
(h) Plan sheets.					
1. A survey grid.	Y				Attachment 15, Sheet 3 of 18
2. All drainage patterns and surface water drainage control structures both within the actual fill area and at the site perimeter.	Y				Attachment 15, Sheets 1 of 18
3. Ground surface contours at the time represented by the drawing. Spot elevations for key features.	Y				Attachment 15, Sheets 1 of 18 and 3 of 18



ITEM	COMPLETE (Y/N)	TECHNICALLY ADEQUATE (Y/N)	SEE ATTACHED COMMENT	SEE ATTACHED EXHIBIT	LOCATION OF INFORMATION/COMMENTS
4. Access roads and traffic flow patterns within the facility.	Y				Attachment 15, Sheet 2 of 18
5. All temporary and permanent fencing.	Y				Attachment 15, Sheet 2 of 18
6. Methods of screening such as berms, vegetation or special fencing.	Y				Attachment 15, Sheet 2 of 18
7. Groundwater monitoring devices and detection systems.	N/A				N/A
8. Support buildings, scale, utilities, gates and signs.	Y				Attachment 15, Sheet 2 of 18
9. Special waste handling areas.	Y				Attachment 15, Sheet 2 of 18
10. Construction notes and references to details.	Y				Attachments 8 and 15
11. Other appropriate site features.	Y				Attachment 15
(f) Except as otherwise provided in s. NR 645.02, owners and operators of tanks shall provide the following information:					
1. A written assessment that is reviewed and certified by an independent, qualified, registered professional engineer as to the structural integrity and suitability for handling hazardous waste of each tank system as required by ss. NR 645.07 and NR 645.08.	Y				Attachment 7
2. Dimensions and capacity of each tank.	Y				Attachment 7
3. Description of feed systems, safety cutoff, bypass systems and pressure controls, such as vents.	Y				Attachment 7
4. A diagram of piping, instrumentation and process flow for each tank system.	Y				Attachment 15, Sheets 14 of 18 and 15 of 18
5. A description of materials and equipment used to provide external corrosion protection as required by s. NR 645.08(1)(c)2.	Y				Attachment 7
6. For new tank systems, a detailed description of how the tank system shall be installed in compliance with s. NR 645.08 (2) to (5).	Y				Attachment 7
7. Detailed plans and description of how the secondary containment system for each tank system is designed and constructed to meet the requirements of s. NR 645.09 (3) to (8).	Y				Attachment 7 and Attachment 8, Appendix A
8. For tank systems for which a variance from the requirements of s. NR 645.09 is sought as provided by s. NR 645.09 (9).	N/A				N/A
9. Description of controls and practices to prevent spills and overflows as required under s. NR 645.10 (2).	Y				Attachment 7
10. Detailed plans and description of how the secondary containment system for each tank system is or shall be operated to meet the requirements of s. NR 645.09 (3) to (8).	Y				Attachment 7



ITEM	COMPLETE (Y/N)	TECHNICALLY ADEQUATE (Y/N)	SEE ATTACHED COMMENT	SEE ATTACHED EXHIBIT	LOCATION OF INFORMATION/COMMENTS
11. For tank systems in which ignitable, reactive or incompatible wastes are to be stored or treated, a description of how the operating procedures and the tank system and facility design shall achieve compliance with the requirements of ss. NR 645.13 and 645.14 (2).	Y				Attachment 7
<b>THE FEASIBILITY REPORT FOR HAZARDOUS WASTE CONTAINER STORAGE FACILITIES MUST INCLUDE A NARRATIVE CONTAINING THE FOLLOWING INFORMATION. NR 645.06(2)</b>					
(a) A description of the containment system to demonstrate compliance with NR 640.13, including:	Y				Attachment 7 Attachment 8
1. Basic design parameters, dimensions and materials of construction.	Y				Attachment 7, Section 2
2. How the design promotes drainage or how containers are kept from contact with standing liquids in the containment system.	Y				Attachment 8, Section 9
3. Capacity of the containment system relative to the number and volume of the containers.	Y				Attachment 8, Appendix A
4. Provisions for preventing and managing run-on.	Y				Attachment 8, Section 9
5. How accumulated liquids can be analyzed and removed to prevent overflow.	Y				Attachment 7, Section 2 Attachment 8
(b) A description of how NR 630.17(2) shall be complied with to meet the requirements of NR 645.13 (special requirements for ignitable or reactive waste) and NR 645.14 (special requirements for incompatible wastes).	Y				Attachment 8, Section 12
(c) Sketches, drawings or data demonstrating compliance with the buffer zone requirements of NR 645.13(2) (special requirements for ignitable or reactive waste).	Y				Attachment 15, Sheet 2 of 18
(d) Operations and maintenance manual consisting of the following:	Y				Attachment 7, Section 2
1. Identification of the project.	Y				Attachment 7, Section 1
2. Specifications for site construction and operation.	Y				Attachment 7, Section 2
3. A description of daily operations.	Y				Attachment 7, Section 2 and Attachment 8
(e) Design Report, including:					
1. A discussion of the reasoning and logic behind the design of the major features of the site.	Y				Attachment 7, Section 2
2. A closure plan as required by NR 645.17 and NR 685.05.	Y				Attachment 11
a. Description of how facility is to be closed.	Y				Attachment 11, Sections 3, 4 and 5
b. A description of possible land uses after closure.	Y				Attachment 11, Section 11





ITEM	COMPLETE (Y/N)	TECHNICALLY ADEQUATE (Y/N)	SEE ATTACHED COMMENT	SEE ATTACHED EXHIBIT	LOCATION OF INFORMATION/COMMENTS
c. Anticipated time until closing, the estimated time for closure, and any anticipated partial closures.	Y				Attachment 11, Section 9
d. Estimate of maximum waste inventory.	Y				Attachment 11, Section 2
e. A description of decontamination procedures.	Y				Attachment 11, Sections 4 and 8
3. A detailed analysis in accordance with NR 885.07 of financial responsibility for closure from the time of facility closure to termination.	Y				Attachment 11, Section 10 and Attachment 12
(f) A contingency plan as specified in NR 830.21 and NR 830.22(1) and (2).	Y				Attachment 9
1. Names, positions, addresses and phone numbers of all persons qualified to act as emergency coordinator.	Y				Attachment 9, Section 3
2. Description of facility layout, types and characteristics of wastes handled, work areas and entrances to the facility.	Y				Attachment 7
3. Evacuation plan.	Y				Attachment 9, Section 6
4. Procedures for emergency shutdown of facility operations.	Y				Attachment 9, Section 8
5. Emergency notification procedures.	Y				Attachment 9, Section 4
6. Listing, description and location of emergency equipment.	Y				Attachment 9, Section 5
(g) An appendix which shall include any additional data not previously presented, calculations, material specifications, operating agreements and other appropriate information.	Y				Following each Attachment, if appropriate.
<b>OTHER SUBMITTAL REQUIREMENTS</b>					
Required notifications pursuant to NR 880.06(1)	Y				Attachment 4, Section 1
Required notifications and other conditions pursuant NR 825.07(8) (standards applicable to marketers of hazardous waste)	Y				Attachment 4, Section 2
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Erosion Control  
Stress Calculations  
Structural & Stress Calculations  
Sidewall & Bottom Structure and Corrosion Calculations  
Structural Loading Calculations

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**ATTACHMENT 18      LICENSING CORRESPONDENCE**

Notice of Incompleteness Response dated February 27, 1995  
Notice of Incompleteness Response dated April 21, 1995  
Notice of Completeness & Preliminary Determination Response dated November 10, 1995  
Feasibility and Plan of Operation Report Determination dated April 19, 1996









**ATTACHMENT 1: PART A APPLICATIONS**



**ATTACHMENT 1**  
**EXISTING AND PROPOSED FACILITY**  
**PART A APPLICATIONS**

**NOTE: REPLACE THE EXISTING AND PROPOSED FACILITY PART A APPLICATIONS IN ATTACHMENT 1.**




## **Section 1**

### **EXISTING FACILITY PART A APPLICATION**





For EPA Regional Use Only  Date Received Month    Day    Year <div style="border: 1px solid black; width: 20px; height: 20px; display: inline-block;"></div> <div style="border: 1px solid black; width: 20px; height: 20px; display: inline-block;"></div> <div style="border: 1px solid black; width: 20px; height: 20px; display: inline-block;"></div> <div style="border: 1px solid black; width: 20px; height: 20px; display: inline-block;"></div> <div style="border: 1px solid black; width: 20px; height: 20px; display: inline-block;"></div> <div style="border: 1px solid black; width: 20px; height: 20px; display: inline-block;"></div>	 United States Environmental Protection Agency Washington, DC 20460 <h1 style="margin: 0;">Hazardous Waste Permit Application</h1> <h2 style="margin: 0;">Part A</h2> <p><i>(Read the Instructions before starting)</i></p>	For State Use Only  
<b>I. ID Number(s)</b>		
A. EPA ID Number W I D 9 8 8 5 8 0 0 5 6		B. Secondary ID Number (if applicable)
<b>II. Name of Facility</b> E O G D I S P O S A L I N C		
<b>III. Facility Location (Physical address not P.O. Box or Route Number)</b>		
A. Street 5 6 1 1 W E S T H E M L O C K S T R E E T		
Street (continued)		
City or Town    State    ZIP Code M I L W A U K E E    W I    5 3 2 2 3 -		
County Code    County Name (if known)    M I L W A U K E E		
<b>B. Land Type    C. Geographic Location    D. Facility Existence Date</b>		
(enter code) P	LATITUDE (degrees, minutes, & seconds) 4 3 0 9 0 0 6	LONGITUDE (degrees, minutes, & seconds) 0 8 7 5 9 0 0 1
		Month    Day    Year 0 9 0 1 1 9 9 0
<b>IV. Facility Mailing Address</b>		
Street or P.O. Box 5 6 1 1 W E S T H E M L O C K S T R E E T		
City or Town    State    ZIP Code -		
<b>V. Facility Contact (Person to be contacted regarding waste activities at facility)</b>		
Name (last) V I L I O N E		(first) M I C H A E L
Job Title P R E S I D E N T		Phone Number (area code and number) 4 1 4 - 3 5 3 - 1 1 5 6
<b>VI. Facility Contact Address (See Instructions)</b>		
A. Contact Address Location    Mailing X		B. Street or P.O. Box
City or Town    State    ZIP Code -		



EPA ID Number (enter from page 1)												Secondary ID Number (enter from page 1)											
W	I	D	9	8	8	5	8	0	0	5	6												

**XI. Nature of Business (provide a brief description)**

Transportation, laboratory analysis, storage, consolidation, and packaging of hazardous and nonhazardous materials and solid wastes for exempt recycling activities.

**XII. Process—Codes and Design Capacities**

**A. PROCESS CODE**—Enter the code from the list of process codes below that best describes each process to be used at the facility. Twelve lines are provided for entering codes. If more lines are needed, attach a separate sheet of paper with the additional information. If a process will be used that is not included in the list of codes below, then describe the process (including its design capacity) in the space provided in item XIII.

**B. PROCESS DESIGN CAPACITY**—For each code entered in column A, enter the capacity of the process.

- 1. AMOUNT**—Enter the amount. In a case where design capacity is not applicable (such as in a closure/post-closure or enforcement action) enter the total amount of waste for that process unit.
- 2. UNIT OF MEASURE**—For each amount entered in column B(1), enter the code from the list of unit measure codes below that describes the unit of measure used. Only the units of measure that are listed below should be used.

**C. PROCESS TOTAL NUMBER OF UNITS**—Enter the total number of units used with the corresponding process code.

PROCESS CODE	PROCESS	APPROPRIATE UNITS OF MEASURE FOR PROCESS DESIGN CAPACITY	UNIT OF MEASURE	UNIT OF MEASURE CODE
D79	<b>DISPOSAL:</b> INJECTION WELL	GALLONS; LITERS; GALLONS PER DAY; OR LITERS PER DAY	GALLONS .....	G
D80	LANDFILL	ACRE-FEET OR HECTARE-METER	GALLONS PER HOUR .....	E
D81	LAND APPLICATION	ACRES OR HECTARES	GALLONS PER DAY .....	U
D82	OCEAN DISPOSAL	GALLONS PER DAY OR LITERS PER DAY	LITERS .....	L
D83	SURFACE IMPOUNDMENT	GALLONS OR LITERS	LITERS PER HOUR .....	H
S01	<b>STORAGE:</b> CONTAINER (barrel, drum, etc.)	GALLONS OR LITERS	LITERS PER DAY .....	V
S02	TANK	GALLONS OR LITERS	SHORT TONS PER HOUR .....	D
S03	WASTE PILE	CUBIC YARDS OR CUBIC METERS	METRIC TONS PER HOUR .....	W
S04	SURFACE IMPOUNDMENT	GALLONS OR LITERS	SHORT TONS PER DAY .....	N
T01	<b>TREATMENT:</b> TANK	GALLONS PER DAY OR LITERS PER DAY	METRIC TONS PER DAY .....	S
T02	SURFACE IMPOUNDMENT	GALLONS PER DAY OR LITERS PER DAY	POUNDS PER HOUR .....	J
T03	INCINERATOR	SHORT TONS PER HOUR; METRIC TONS PER HOUR; GALLONS PER HOUR; LITERS PER HOUR; OR BTU'S PER HOUR	KILOGRAMS PER HOUR .....	R
T04	OTHER TREATMENT  (Use for physical, chemical, thermal or biological treatment processes not occurring in tanks, surface impoundment or incinerators. Describe the processes in the space provided in item XIII.)	GALLONS PER DAY; LITERS PER DAY; POUNDS PER HOUR; SHORT TONS PER HOUR; KILOGRAMS PER HOUR; METRIC TONS PER DAY; METRIC TONS PER HOUR; OR SHORT TONS PER DAY	CUBIC YARDS .....	Y
			CUBIC METERS .....	C
			ACRES .....	B
			ACRE-FEET .....	A
			HECTARES .....	Q
			HECTARE-METER .....	F
			BTU's PER HOUR .....	K



EPA ID Number (enter from page 1)

Secondary ID Number (enter from page 1)

W I D 9 8 8 5 8 0 0 5 6

**XIV. Description of Hazardous Wastes**

**A. EPA HAZARDOUS WASTE NUMBER** - Enter the four-digit number from 40 CFR, Part 261 Subpart D of each listed hazardous waste you will handle. For hazardous wastes which are not listed in 40 CFR, Part 261 Subpart D, enter the four-digit number(s) from 40 CFR, Part 261 Subpart C that describes the characteristics and/or the toxic contaminants of those hazardous wastes.

**B. ESTIMATED ANNUAL QUANTITY** - For each listed waste entered in column A estimate the quantity of that waste that will be handled on an annual basis. For each characteristic or toxic contaminant entered in column A estimate the total annual quantity of all the non-listed waste(s) that will be handled which possess that characteristic or contaminant.

**C. UNIT OF MEASURE** - For each quantity entered in column B enter the unit of measure code. Units of measure which must be used and the appropriate codes are:

ENGLISH UNIT OF MEASURE	CODE	METRIC UNIT OF MEASURE	CODE
POUNDS	P	KILOGRAMS	K
TONS	T	METRIC TONS	M

If facility records use any other unit of measure for quantity, the units of measure must be converted into one of the required units of measure taking into account the appropriate density or specific gravity of the waste.

**D. PROCESSES****1. PROCESS CODES**

For listed hazardous waste: For each listed hazardous waste entered in column A select the code(s) from the list of process codes contained in Item XII A on page 3 to indicate how the waste will be stored, treated, and/or disposed of at the facility.

For non-listed hazardous waste: For each characteristic or toxic contaminant entered in column A, select the code(s) from the list of process codes contained in Item XII A on page 3 to indicate all the processes that will be used to store, treat, and/or dispose of all the non-listed hazardous wastes that possess that characteristic or toxic contaminant.

**NOTE: THREE SPACES ARE PROVIDED FOR ENTERING PROCESS CODES. IF MORE ARE NEEDED:**

1. Enter the first two as described above.
  2. Enter "000" in the extreme right box of Item XIV-D(1).
  3. Enter in the space provided on page 7, Item XIV-E, the line number and the additional code(s).
- 2. PROCESS DESCRIPTION** - If a code is not listed for a process that will be used, describe the process in the space provided on the form (D(2)).

**NOTE: HAZARDOUS WASTES DESCRIBED BY MORE THAN ONE EPA HAZARDOUS WASTE NUMBER** - Hazardous wastes that can be described by more than one EPA Hazardous Waste Number shall be described on the form as follows:

1. Select one of the EPA Hazardous Waste Numbers and enter it in column A. On the same line complete columns B, C, and D by estimating the total annual quantity of the waste and describing all the processes to be used to treat, store, and/or dispose of the waste.
2. In column A of the next line enter the other EPA Hazardous Waste Number that can be used to describe the waste. In column D(2) on that line enter "Included with above" and make no other entries on that line.
3. Repeat step 2 for each EPA Hazardous Waste Number that can be used to describe the hazardous waste.

**EXAMPLE FOR COMPLETING ITEM XIV (shown in line numbers X-1, X-2, X-3, and X-4 below)** - A facility will treat and dispose of an estimated 900 pounds per year of chrome shavings from leather tanning and finishing operation. In addition, the facility will treat and dispose of three non-listed wastes. Two wastes are corrosive only and there will be an estimated 200 pounds per year of each waste. The other waste is corrosive and ignitable and there will be an estimated 100 pounds per year of that waste. Treatment will be in an incinerator and disposal will be in a landfill.

Line Number	A. EPA HAZARD WASTE NO. (enter code)	B. ESTIMATED ANNUAL QUANTITY OF WASTE	C. UNIT OF MEASURE (enter code)	D. PROCESS	
				(1) PROCESS CODES (enter)	(2) PROCESS DESCRIPTION (if a code is not entered in D(1))
X-1	D 0 5 4	900	P	T 0 3 D 8 0	
X-2	D 0 0 2	400	P	T 0 3 D 8 0	
X-3	D 0 0 1	100	P	T 0 3 D 8 0	
X-4	D 0 0 2				Included With Above



XIV. Description of Hazardous Wastes (continued)

Line Number		A. EPA HAZARDOUS WASTE NO. (enter code)				B. ESTIMATED ANNUAL QUANTITY OF WASTE	C. UNIT OF MEASURE (enter code)	D. PROCESSES											
								(1) PROCESS CODES (enter)								(2) PROCESS DESCRIPTION (if a code is not entered in D(1))			
3	4	D	0	3	7	250,000	P	S	0	1									
3	5	D	0	3	8	250,000	P	S	0	1									
3	6	D	0	3	9	250,000	P	S	0	1									
3	7	D	0	4	0	250,000	P	S	0	1									
3	8	D	0	4	1	250,000	P	S	0	1									
3	9	D	0	4	2	250,000	P	S	0	1									
4	0	D	0	4	3	250,000	P	S	0	1									
4	1																		
4	2																		
4	3																		
4	4																		
4	5																		
4	6																		
4	7																		
4	8																		
4	9																		
5	0																		
5	1																		
5	2																		
5	3																		
5	4																		
5	5																		
5	6																		
5	7																		
5	8																		
5	9																		
6	0																		
6	1																		
6	2																		
	3																		
6	4																		





XIV. Description of Hazardous Waste (continued)

E. USE THIS SPACE TO LIST ADDITIONAL PROCESS CODES FROM ITEM D(1) ON PAGE 6.

XV. Map

## XVI. Facility Drawing

## XVII. Photographs

### XVIII. Certification(s)

Owner Signature \_\_\_\_\_

Date Signed \_\_\_\_\_

2/24/93

Name and Official Title (type or print)

Michael Vilione, General Partner

Operator Signature \_\_\_\_\_

Date Signed \_\_\_\_\_

ed  
2/24/93

Name and Official Title (type or print)

Michael Vilione, President

## XIX. Comments

Additional owner information:

Megal Development Corporation

P. O. Box 18661

Milwaukee, WI 53218

(414) 781-9775

**Note: Mail completed form to the appropriate EPA Regional or State Office. (refer to instructions for more information)**



## **Section 2**

### **PROPOSED FACILITY PART A APPLICATION**



Form Approved. OMB No. 2050-0034 Expires 12-31-91  
GSA No. 0246-EPA-OT

For EPA Regional Use Only		<div>EPA</div> <div>United States Environmental Protection Agency</div> <div>Washington, DC 20460</div> <div>Hazardous Waste Permit Application</div> <div>Part A</div> <div>(Read the Instructions before starting)</div>		For State Use Only	
Date Received Month Day Year					
I. ID Number(s)		A. EPA ID Number		B. Secondary ID Number (If applicable)	
W I D 9 8 8 5 8 0 0 5 6					
II. Name of Facility		E O G D I S P O S A L I N C			
III. Facility Location (Physical address not P.O. Box or Route Number)		A. Street			
5 6 1 1 H E M L O C K S T R E E T					
Street (continued)					
City or Town		State		ZIP Code	
M I L W A K E E		W I		5 3 2 2 3 -	
County Code (if known)		County Name			
		M I L W A U K E E			
B. Land Type		C. Geographic Location		D. Facility Existence Date	
(enter code)		LATITUDE (degrees, minutes, & seconds)		LONGITUDE (degrees, minutes, & seconds)	
P		4 3 0 9 0 0 6		0 8 7 5 9 0 0 1	
				Month Day Year	
				0 9 0 1 1 9 9 0	
IV. Facility Mailing Address		Street or P.O. Box			
5 6 1 1 H E M L O C K S T R E E T					
City or Town		State		ZIP Code	
M I L W A U K E E		W I		5 3 2 2 3 -	
V. Facility Contact (Person to be contacted regarding waste activities at facility)		Name (last)		(first)	
V I L I O N E				M I C H E A L	
Job Title		Phone Number (area code and number)			
P R E S I D E N T		4 1 4 - 3 5 3 - 1 1 5 6			
VI. Facility Contact Address (See Instructions)		Contact Address Location Mailing		B. Street or P.O. Box	
X					
City or Town		State		ZIP Code	



[illegible]





EPA ID Number (enter from page 1)

Secondary ID Number (enter from page 1)

W I D 9 8 8 5 8 0 0 5 6

XII. Nature of Business (provide a brief description)

Transportation, laboratory analysis, storage, consolidation, and packaging of hazardous and nonhazardous materials and solid wastes for exempt recycling activities.

## XII. Process Codes and Design Capacities

A. **PROCESS CODE** - Enter the code from the list of process codes below that best describes each process to be used at the facility. Twelve lines are provided for entering codes. If more lines are needed, attach a separate sheet of paper with the additional information. If a process will be used that is not included in the list of codes below, then describe the process (including its design capacity) in the space provided in item XIII.

B. **PROCESS DESIGN CAPACITY** - For each code entered in column A, enter the capacity of the process.

1. **AMOUNT** - Enter the amount. In a case where design capacity is not applicable (such as in a closure/post-closure or enforcement action) enter the total amount of waste for that process unit.

2. **UNIT OF MEASURE** - For each amount entered in column B(1), enter the code from the list of unit measure codes below that describes the unit of measure used. Only the units of measure that are listed below should be used.

C. **PROCESS TOTAL NUMBER OF UNITS** - Enter the total number of units used with the corresponding process code.

PROCESS CODE	PROCESS	APPROPRIATE UNITS OF MEASURE FOR PROCESS DESIGN CAPACITY	UNIT OF MEASURE	UNIT OF MEASURE CODE
D79	<b>DISPOSAL:</b> INJECTION WELL	GALLONS; LITERS; GALLONS PER DAY; OR LITERS PER DAY	GALLONS .....	G
D80	LANDFILL	ACRE-FEET OR HECTARE-METER	GALLONS PER HOUR .....	E
D81	LAND APPLICATION	ACRES OR HECTARES	GALLONS PER DAY .....	U
D82	OCEAN DISPOSAL	GALLONS PER DAY OR LITERS PER DAY	LITERS .....	L
D83	SURFACE IMPOUNDMENT	GALLONS OR LITERS	LITERS PER HOUR .....	H
S01	<b>STORAGE:</b> CONTAINER (barrel, drum, etc.)	GALLONS OR LITERS	LITERS PER DAY .....	V
S02	TANK	GALLONS OR LITERS	SHORT TONS PER HOUR .....	D
S03	WASTE PILE	CUBIC YARDS OR CUBIC METERS	METRIC TONS PER HOUR .....	W
S04	SURFACE IMPOUNDMENT	GALLONS OR LITERS	SHORT TONS PER DAY .....	N
T01	<b>TREATMENT:</b> TANK	GALLONS PER DAY OR LITERS PER DAY	METRIC TONS PER DAY .....	S
T02	SURFACE IMPOUNDMENT	GALLONS PER DAY OR LITERS PER DAY	POUNDS PER HOUR .....	J
T03	INCINERATOR	SHORT TONS PER HOUR; METRIC TONS PER HOUR; GALLONS PER HOUR; LITERS PER HOUR; OR BTU'S PER HOUR	KILOGRAMS PER HOUR .....	R
T04	OTHER TREATMENT <small>(Use for physical, chemical, thermal or biological treatment processes not occurring in tanks, surface impoundment or incinerators. Describe the processes in the space provided in item XIII.)</small>	GALLONS PER DAY; LITERS PER DAY; POUNDS PER HOUR; SHORT TONS PER HOUR; KILOGRAMS PER HOUR; METRIC TONS PER DAY; METRIC TONS PER HOUR; OR SHORT TONS PER DAY	CUBIC YARDS .....	Y
			CUBIC METERS .....	C
			ACRES .....	B
			ACRE-FEET .....	A
			HECTARES .....	Q
			HECTARE-METER .....	F
			BTU's PER HOUR .....	K



EPA ID Number (enter from page 1)												Secondary ID Number (enter from page 1)											
W	I	D	9	8	8	5	8	0	0	5	6												

## XII. Process Codes and Design Capacities (continued)

EXAMPLE FOR COMPLETING ITEM XII (shown in line numbers X-1 and X-2 below). A facility has two storage tanks. One tank can hold 200 gallons and the other can hold 400 gallons. The facility also has an incinerator that can burn up to 20 gallons per hour.

Line Number	A. PROCESS CODE (from list above)			B. PROCESS DESIGN CAPACITY		C. PROCESS TOTAL NUMBER OF UNITS	FOR OFFICIAL USE ONLY			
				1. AMOUNT (specify)	2. UNIT OF MEASURE (enter code)					
X-1	1	S	0	2	600	G	0	0	2	
X-2	2	T	0	0	20	EP	0	0	1	
	1	S	0	1	70,675	G	1	28	5	
	2	S	0	2	61,000	G	0	0	7	
	3	S	0	1	120	Y	0	0	6	
	4									
	5									
	6									
	7									
	8									
	9									
	10									
	11									
	12									

NOTE: If you need to list more than 12 process codes, attach an additional sheet(s) with the information in the same format as above. Number the lines sequentially, taking into account any lines that will be used for additional treatment processes in Item XIII.

## XIII. Additional Treatment Processes (follow instructions from Item XII)

Line Number (enter numbers in sequence with Item XII)	A. PROCESS CODE			B. TREATMENT PROCESS DESIGN CAPACITY		C. PROCESS TOTAL NUMBER OF UNITS	D. DESCRIPTION OF PROCESS
				1. AMOUNT (specify)	2. UNIT OF MEASURE (enter code)		
	T	0	4				
	T	0	4				
	T	0	4				
	T	0	4				



EPA I.D. Number (enter from page 1)	Secondary ID Number (enter from page 1)
<div style="display: flex; justify-content: space-between;"> <span>W</span><span>I</span><span>D</span><span>9</span><span>8</span><span>8</span><span>5</span><span>8</span><span>0</span><span>0</span><span>5</span><span>6</span> </div>	<div style="display: flex; justify-content: space-between;"> <span></span><span></span><span></span><span></span><span></span><span></span><span></span><span></span><span></span><span></span><span></span><span></span> </div>

**XIV. Description of Hazardous Wastes**

- A. EPA HAZARDOUS WASTE NUMBER** - Enter the four-digit number from 40 CFR, Part 261 Subpart D of each listed hazardous waste you will handle. For hazardous wastes which are not listed in 40 CFR, Part 261 Subpart D, enter the four-digit number(s) from 40 CFR, Part 261 Subpart C that describes the characteristics and/or the toxic contaminants of those hazardous wastes.
- B. ESTIMATED ANNUAL QUANTITY** - For each listed waste entered in column A estimate the quantity of that waste that will be handled on an annual basis. For each characteristic or toxic contaminant entered in column A estimate the total annual quantity of all the non-listed waste(s) that will be handled which possess that characteristic or contaminant.
- C. UNIT OF MEASURE** - For each quantity entered in column B enter the unit of measure code. Units of measure which must be used and the appropriate codes are:

ENGLISH UNIT OF MEASURE	CODE	METRIC UNIT OF MEASURE	CODE
POUNDS	P	KILOGRAMS	K
TONS	T	METRIC TONS	M

If facility records use any other unit of measure for quantity, the units of measure must be converted into one of the required units of measure taking into account the appropriate density or specific gravity of the waste.

**D. PROCESSES****1. PROCESS CODES:**

**For listed hazardous waste:** For each listed hazardous waste entered in column A select the code(s) from the list of process codes contained in Item XII A. on page 3 to indicate how the waste will be stored, treated, and/or disposed of at the facility.

**For non-listed hazardous waste:** For each characteristic or toxic contaminant entered in column A, select the code(s) from the list of process codes contained in Item XII A. on page 3 to indicate all the processes that will be used to store, treat, and/or dispose of all the non-listed hazardous wastes that processes that characteristic or toxic contaminant.

**NOTE: THREE SPACES ARE PROVIDED FOR ENTERING PROCESS CODES. IF MORE ARE NEEDED:**

- Enter the first two as described above.
- Enter "000" in the extreme right box of Item XIV-D(1).
- Enter in the space provided on page 7, Item XIV-E, the line number and the additional code(s).

**2. PROCESS DESCRIPTION:** If a code is not listed for a process that will be used, describe the process in the space provided on the form (D.(2)).

**NOTE: HAZARDOUS WASTES DESCRIBED BY MORE THAN ONE EPA HAZARDOUS WASTE NUMBER** - Hazardous wastes that can be described by more than one EPA Hazardous Waste Number shall be described on the form as follows:

- Select one of the EPA Hazardous Waste Numbers and enter it in column A. On the same line complete columns B, C, and D by estimating the total annual quantity of the waste and describing all the processes to be used to treat, store, and/or dispose of the waste.
- In column A of the next line enter the other EPA Hazardous Waste Number that can be used to describe the waste. In column D(2) on that line enter "Included with above" and make no other entries on that line.
- Repeat step 2 for each EPA Hazardous Waste Number that can be used to describe the hazardous waste.

**EXAMPLE FOR COMPLETING ITEM XIV (shown in line numbers X-1, X-2, X-3, and X-4 below)** - A facility will treat and dispose of an estimated 900 pounds per year of chrome shavings from leather tanning and finishing operation. In addition, the facility will treat and dispose of three non-listed wastes. Two wastes are corrosive only and there will be an estimated 200 pounds per year of each waste. The other waste is corrosive and ignitable and there will be an estimated 100 pounds per year of that waste. Treatment will be in an incinerator and disposal will be in a landfill.

Line Number	A. EPA HAZARD WASTE NO. (enter code)				B. ESTIMATED ANNUAL QUANTITY OF WASTE	C. UNIT OF MEASURE (enter code)	D. PROCESS										
	(1) PROCESS CODES (enter)						(2) PROCESS DESCRIPTION (if a code is not entered in D(1))										
X 1	K	0	5	4	900	P	T	0	3	D	8	0					
X 2	D	0	0	2	400	P	T	0	3	D	8	0					
X 3	D	0	0	1	100	P	T	0	3	D	8	0					
X 4	D	0	0	2													Included With Above



EPA ID Number (enter from page 1)										Secondary ID Number (enter from page 1)									
W	I	D	9	8	8	5	8	0	0	5	6								
XIV Description of Hazardous Wastes (continued)																			
Line Number		EPA HAZARDOUS WASTE NO. (enter Code)				ESTIMATED ANNUAL QUANTITY OF WASTE	UNIT OF MEASURE (enter Code)	(1) PROCESS CODES (enter)						(2) PROCESS DESCRIPTION (if Code is not entered in D(1))					
		D	0	0	1	1,189,500	P	S	0	1	S	0	2						
		D	0	0	2	10	P	S	0	1	S	0	2						
		D	0	0	3	10	P	S	0	1	S	0	2						
		D	0	0	4	10	P	S	0	1	S	0	2						
		D	0	0	5	10	P	S	0	1	S	0	2						
		D	0	0	6	10	P	S	0	1	S	0	2						
		D	0	0	7	10	P	S	0	1	S	0	2						
		D	0	0	8	10	P	S	0	1	S	0	2						
		D	0	0	9	10	P	S	0	1	S	0	2						
		D	0	1	0	10	P	S	0	1	S	0	2						
		D	0	1	1	10	P	S	0	1	S	0	2						
		D	0	1	2	10	P	S	0	1	S	0	2						
		D	0	1	3	10	P	S	0	1	S	0	2						
		D	0	1	4	10	P	S	0	1	S	0	2						
		D	0	1	5	10	P	S	0	1	S	0	2						
		D	0	1	6	10	P	S	0	1	S	0	2						
		D	0	1	7	10	P	S	0	1	S	0	2						
		D	0	1	8	10	P	S	0	1	S	0	2						
		D	0	1	9	10	P	S	0	1	S	0	2						
		D	0	2	0	10	P	S	0	1	S	0	2						
		D	0	2	1	10	P	S	0	1	S	0	2						
		D	0	2	2	10	P	S	0	1	S	0	2						
		D	0	2	3	10	P	S	0	1	S	0	2						
		D	0	2	4	10	P	S	0	1	S	0	2						
		D	0	2	5	10	P	S	0	1	S	0	2						
		D	0	2	6	10	P	S	0	1	S	0	2						
		D	0	2	7	10	P	S	0	1	S	0	2						
		D	0	2	8	10	P	S	0	1	S	0	2						
		D	0	2	9	10	P	S	0	1	S	0	2						
3	0	D	0	3	0	10	P	S	0	1	S	0	2						
3	1	D	0	3	1	10	P	S	0	1	S	0	2						
3	2	D	0	3	2	10	P	S	0	1	S	0	2						
3	3	D	0	3	3	10	P	S	0	1	S	0	2						





EPA ID. Number (enter from page 1)											Secondary ID Number (enter from page 1)												
W	I	D	9	8	8	5	8	0	0	5	6												
IV. Description of Hazardous Wastes (continued)																							
Line Number		A. EPA HAZARDOUS WASTE NO. (enter code)				B. ESTIMATED ANNUAL QUANTITY OF WASTE	C. UNIT OF MEASURE (enter code)	D. PROCESSES															
								(1) PROCESS CODES (enter)						(2) Process Description (if a code is not entered in D(1))									
3	4	D	0	3	4	10	P	S	0	1	S	0	2										
3	5	D	0	3	5	10	P	S	0	1	S	0	2										
3	6	D	0	3	6	10	P	S	0	1	S	0	2										
3	7	D	0	3	7	10	P	S	0	1	S	0	2										
3	8	D	0	3	8	10	P	S	0	1	S	0	2										
3	9	D	0	3	9	10	P	S	0	1	S	0	2										
4	0	D	0	4	0	10	P	S	0	1	S	0	2										
4	1	D	0	4	1	10	P	S	0	1	S	0	2										
4	2	D	0	4	2	10	P	S	0	1	S	0	2										
4	3	D	0	4	3	10	P	S	0	1	S	0	2										
4	4	F	0	0	1	1,189,500	P	S	0	1	S	0	2										
4	5	F	0	0	2	1,189,500	P	S	0	1	S	0	2										
4	6	F	0	0	3	1,189,500	P	S	0	1	S	0	2										
4	7	F	0	0	4	10	P	S	0	1	S	0	2										
4	8	F	0	0	5	1,189,500	P	S	0	1	S	0	2										
4	9	F	0	0	6	10	P	S	0	1	S	0	2										
5	0	F	0	0	7	10	P	S	0	1	S	0	2										
5	1	F	0	0	8	10	P	S	0	1	S	0	2										
5	2	F	0	0	9	10	P	S	0	1	S	0	2										
5	3	F	0	1	0	10	P	S	0	1	S	0	2										
5	4	F	0	1	1	10	P	S	0	1	S	0	2										
5	5	F	0	1	2	10	P	S	0	1	S	0	2										
5	6	F	0	1	9	10	P	S	0	1	S	0	2										
5	7	F	0	2	0	10	P	S	0	1	S	0	2										
5	8	F	0	2	1	10	P	S	0	1	S	0	2										
5	9	F	0	2	2	10	P	S	0	1	S	0	2										
6	0	F	0	2	3	10	P	S	0	1	S	0	2										
6	1	F	0	2	4	10	P	S	0	1	S	0	2										
6	2	F	0	2	5	10	P	S	0	1	S	0	2										
6	3	F	0	2	6	10	P	S	0	1	S	0	2										
6	4	F	0	2	7	10	P	S	0	1	S	0	2										



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W I D 9 8 8 5 8 0 0 5 6

## IV. Description of Hazardous Wastes (continued)

Line Number	A. EPA HAZARDOUS WASTE NO. (enter code)				B. ESTIMATED ANNUAL QUANTITY OF WASTE	C. UNIT OF MEASURE (enter code)	D. PROCESSES										
							(1) PROCESS CODES (enter)						(2) Process Description (If a code is not entered in D(1))				
6	5	F	0	2	8	10	P	S	0	1	S	0	2				
6	6	F	0	3	2	10	P	S	0	1	S	0	2				
6	7	F	0	3	4	10	P	S	0	1	S	0	2				
6	8	F	0	3	5	10	P	S	0	1	S	0	2				
6	9	F	0	3	7	10	P	S	0	1	S	0	2				
7	0	F	0	3	8	10	P	S	0	1	S	0	2				
7	1	F	0	3	9	10	P	S	0	1	S	0	2				
7	2	K	0	0	1	10	P	S	0	1	S	0	2				
7	3	K	0	0	2	10	P	S	0	1	S	0	2				
7	4	K	0	0	3	10	P	S	0	1	S	0	2				
7	5	K	0	0	4	10	P	S	0	1	S	0	2				
7	6	K	0	0	5	10	P	S	0	1	S	0	2				
7	7	K	0	0	6	10	P	S	0	1	S	0	2				
7	8	K	0	0	7	10	P	S	0	1	S	0	2				
7	9	K	0	0	8	10	P	S	0	1	S	0	2				
8	0	K	0	0	9	10	P	S	0	1	S	0	2				
8	1	K	0	1	0	10	P	S	0	1	S	0	2				
8	2	K	0	1	1	10	P	S	0	1	S	0	2				
8	3	K	0	1	3	10	P	S	0	1	S	0	2				
8	4	K	0	1	4	10	P	S	0	1	S	0	2				
8	5	K	0	1	5	10	P	S	0	1	S	0	2				
8	6	K	0	1	6	10	P	S	0	1	S	0	2				
8	7	K	0	1	7	10	P	S	0	1	S	0	2				
8	8	K	0	1	8	10	P	S	0	1	S	0	2				
8	9	K	0	1	9	10	P	S	0	1	S	0	2				
9	0	K	0	2	0	10	P	S	0	1	S	0	2				
9	1	K	0	2	1	10	P	S	0	1	S	0	2				
9	2	K	0	2	2	10	P	S	0	1	S	0	2				
9	3	K	0	2	3	10	P	S	0	1	S	0	2				
9	4	K	0	2	4	10	P	S	0	1	S	0	2				
9	5	K	0	2	5	10	P	S	0	1	S	0	2				



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W I D 9 8 8 5 8 0 0 5 6

## KIV. Description of Hazardous Wastes (continued)

Line Number	A. EPA HAZARDOUS WASTE NO. (enter code)				B. ESTIMATED ANNUAL QUANTITY OF WASTE	C. UNIT OF MEASURE (enter code)	D. PROCESSES										(2) Process Description (if a code is not entered in D(1))
	(1) PROCESS CODES (enter)																
9	6	K	0	2	6	10	P	S	0	1	S	0	2				
9	7	K	0	2	7	10	P	S	0	1	S	0	2				
9	8	K	0	2	8	10	P	S	0	1	S	0	2				
9	9	K	0	2	9	10	P	S	0	1	S	0	2				
10	0	K	0	3	0	10	P	S	0	1	S	0	2				
10	1	K	0	3	1	10	P	S	0	1	S	0	2				
10	2	K	0	3	2	10	P	S	0	1	S	0	2				
10	3	K	0	3	3	10	P	S	0	1	S	0	2				
10	4	K	0	3	4	10	P	S	0	1	S	0	2				
10	5	K	0	3	5	10	P	S	0	1	S	0	2				
10	6	K	0	3	6	10	P	S	0	1	S	0	2				
10	7	K	0	3	7	10	P	S	0	1	S	0	2				
10	8	K	0	3	8	10	P	S	0	1	S	0	2				
10	9	K	0	3	9	10	P	S	0	1	S	0	2				
11	0	K	0	4	0	10	P	S	0	1	S	0	2				
11	1	K	0	4	1	10	P	S	0	1	S	0	2				
11	2	K	0	4	2	10	P	S	0	1	S	0	2				
11	3	K	0	4	3	10	P	S	0	1	S	0	2				
11	4	K	0	4	4	10	P	S	0	1	S	0	2				
11	5	K	0	4	5	10	P	S	0	1	S	0	2				
11	6	K	0	4	6	10	P	S	0	1	S	0	2				
11	7	K	0	4	7	10	P	S	0	1	S	0	2				
11	8	K	0	4	8	10	P	S	0	1	S	0	2				
11	9	K	0	4	9	10	P	S	0	1	S	0	2				
12	0	K	0	5	0	10	P	S	0	1	S	0	2				
12	1	K	0	5	1	10	P	S	0	1	S	0	2				
12	2	K	0	5	2	10	P	S	0	1	S	0	2				
12	3	K	0	6	0	10	P	S	0	1	S	0	2				
12	4	K	0	6	1	10	P	S	0	1	S	0	2				
12	5	K	0	6	2	10	P	S	0	1	S	0	2				
12	6	K	0	6	4	10	P	S	0	1	S	0	2				



EPA ID Number (enter from page 1)

Secondary ID Number (enter from page 1)

W I D 9 8 8 5 8 0 0 5 6

## XIV. Description of Hazardous Wastes (continued)

Line Number	A. EPA HAZARDOUS WASTE NO. (enter code)					B. ESTIMATED ANNUAL QUANTITY OF WASTE	C. UNIT OF MEASURE (enter code)	D. PROCESSES									
								(1) PROCESS CODES (enter)						(2) Process Description (if a code is not entered in D(1))			
12	7	K	0	6	5	10	P	S	0	1	S	0	2				
12	8	K	0	6	6	10	P	S	0	1	S	0	2				
12	9	K	0	6	9	10	P	S	0	1	S	0	2				
13	0	K	0	7	1	10	P	S	0	1	S	0	2				
13	1	K	0	7	3	10	P	S	0	1	S	0	2				
13	2	K	0	8	3	10	P	S	0	1	S	0	2				
13	3	K	0	8	4	10	P	S	0	1	S	0	2				
13	4	K	0	8	5	10	P	S	0	1	S	0	2				
13	5	K	0	8	6	10	P	S	0	1	S	0	2				
13	6	K	0	8	7	10	P	S	0	1	S	0	2				
13	7	K	0	8	8	10	P	S	0	1	S	0	2				
13	8	K	0	9	0	10	P	S	0	1	S	0	2				
13	9	K	0	9	1	10	P	S	0	1	S	0	2				
13	0	K	0	9	3	10	P	S	0	1	S	0	2				
14	1	K	0	9	4	10	P	S	0	1	S	0	2				
14	2	K	0	9	5	10	P	S	0	1	S	0	2				
14	3	K	0	9	6	10	P	S	0	1	S	0	2				
14	4	K	0	9	7	10	P	S	0	1	S	0	2				
14	5	K	0	9	8	10	P	S	0	1	S	0	2				
14	6	K	0	9	9	10	P	S	0	1	S	0	2				
14	7	K	1	0	0	10	P	S	0	1	S	0	2				
14	8	K	1	0	1	10	P	S	0	1	S	0	2				
14	9	K	1	0	2	10	P	S	0	1	S	0	2				
15	0	K	1	0	3	10	P	S	0	1	S	0	2				
15	1	K	1	0	4	10	P	S	0	1	S	0	2				
15	2	K	1	0	5	10	P	S	0	1	S	0	2				
15	3	K	1	0	6	10	P	S	0	1	S	0	2				
15	4	K	1	0	7	10	P	S	0	1	S	0	2				
15	5	K	1	0	8	10	P	S	0	1	S	0	2				
15	6	K	1	0	9	10	P	S	0	1	S	0	2				
15	7	K	1	1	0	10	P	S	0	1	S	0	2				





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Secondary ID Number (enter from page 1)

W I D 9 8 8 5 8 0 0 5 6

## XIV. Description of Hazardous Wastes (continued)

Line Number	A. EPA HAZARDOUS WASTE NO. (enter code)					B. ESTIMATED ANNUAL QUANTITY OF WASTE	C. UNIT OF MEASURE (enter code)	D. PROCESSES										(2) Process Description (If a code is not entered in D(1))
								(1) PROCESS CODES (enter)										
15	8	K	1	1	1	10	P	S	0	1	S	0	2					
15	9	K	1	1	2	10	P	S	0	1	S	0	2					
16	0	K	1	1	3	10	P	S	0	1	S	0	2					
16	1	K	1	1	4	10	P	S	0	1	S	0	2					
16	2	K	1	1	5	10	P	S	0	1	S	0	2					
16	3	K	1	1	6	10	P	S	0	1	S	0	2					
16	4	K	1	1	7	10	P	S	0	1	S	0	2					
16	5	K	1	1	8	10	P	S	0	1	S	0	2					
16	6	K	1	2	3	10	P	S	0	1	S	0	2					
16	7	K	1	2	4	10	P	S	0	1	S	0	2					
16	8	K	1	2	5	10	P	S	0	1	S	0	2					
16	9	K	1	2	6	10	P	S	0	1	S	0	2					
17	0	K	1	3	1	10	P	S	0	1	S	0	2					
17	1	K	1	3	2	10	P	S	0	1	S	0	2					
17	2	K	1	3	6	10	P	S	0	1	S	0	2					
17	3	K	1	4	1	10	P	S	0	1	S	0	2					
17	4	K	1	4	2	10	P	S	0	1	S	0	2					
17	5	K	1	4	3	10	P	S	0	1	S	0	2					
17	6	K	1	4	4	10	P	S	0	1	S	0	2					
17	7	K	1	4	5	10	P	S	0	1	S	0	2					
17	8	K	1	4	7	10	P	S	0	1	S	0	2					
17	9	K	1	4	8	10	P	S	0	1	S	0	2					
18	0	K	1	4	9	10	P	S	0	1	S	0	2					
18	1	K	1	5	0	10	P	S	0	1	S	0	2					
18	2	K	1	5	1	10	P	S	0	1	S	0	2					
18	3	P	0	0	1	10	P	S	0	1	S	0	2					
18	4	P	0	0	2	10	P	S	0	1	S	0	2					
18	5	P	0	0	3	10	P	S	0	1	S	0	2					
18	6	P	0	0	4	10	P	S	0	1	S	0	2					
18	7	P	0	0	5	10	P	S	0	1	S	0	2					
18	8	P	0	0	6	10	P	S	0	1	S	0	2					



EPA ID Number (enter from page 1)

Secondary ID Number (enter from page 1)

W I D 9 8 8 5 8 0 0 5 6

## (IV. Description of Hazardous Wastes (continued))

Line Number	A. EPA HAZARDOUS WASTE NO. (enter code)	B. ESTIMATED ANNUAL QUANTITY OF WASTE	C. UNIT OF MEASURE (enter code)	D. PROCESSES										(2) Process Description (If a code is not entered in D(1))
				(1) PROCESS CODES (enter)										
18	9	P 0 0 7	10	P	S	0	1	S	0	2				
19	0	P 0 0 8	10	P	S	0	1	S	0	2				
19	1	P 0 0 9	10	P	S	0	1	S	0	2				
19	2	P 0 1 0	10	P	S	0	1	S	0	2				
19	3	P 0 1 1	10	P	S	0	1	S	0	2				
19	4	P 0 1 2	10	P	S	0	1	S	0	2				
19	5	P 0 1 3	10	P	S	0	1	S	0	2				
19	6	P 0 1 4	10	P	S	0	1	S	0	2				
19	7	P 0 1 5	10	P	S	0	1	S	0	2				
19	8	P 0 1 6	10	P	S	0	1	S	0	2				
19	9	P 0 1 7	10	P	S	0	1	S	0	2				
20	0	P 0 1 8	10	P	S	0	1	S	0	2				
20	1	P 0 2 0	10	P	S	0	1	S	0	2				
20	2	P 0 2 1	10	P	S	0	1	S	0	2				
20	3	P 0 2 2	10	P	S	0	1	S	0	2				
20	4	P 0 2 3	10	P	S	0	1	S	0	2				
20	5	P 0 2 4	10	P	S	0	1	S	0	2				
20	6	P 0 2 6	10	P	S	0	1	S	0	2				
20	7	P 0 2 7	10	P	S	0	1	S	0	2				
20	8	P 0 2 8	10	P	S	0	1	S	0	2				
20	9	P 0 2 9	10	P	S	0	1	S	0	2				
21	0	P 0 3 0	10	P	S	0	1	S	0	2				
21	1	P 0 3 1	10	P	S	0	1	S	0	2				
21	2	P 0 3 3	10	P	S	0	1	S	0	2				
21	3	P 0 3 4	10	P	S	0	1	S	0	2				
21	4	P 0 3 6	10	P	S	0	1	S	0	2				
21	5	P 0 3 7	10	P	S	0	1	S	0	2				
21	6	P 0 3 8	10	P	S	0	1	S	0	2				
21	7	P 0 3 9	10	P	S	0	1	S	0	2				
21	8	P 0 4 0	10	P	S	0	1	S	0	2				
21	9	P 0 4 1	10	P	S	0	1	S	0	2				



EPA ID Number (enter from page 1)

Secondary ID Number (enter from page 1)

W I D 9 8 8 5 8 0 0 5 6

## IV. Description of Hazardous Wastes (continued)

Line Number	A. EPA HAZARDOUS WASTE NO. (enter code)					B. ESTIMATED ANNUAL QUANTITY OF WASTE	C. UNIT OF MEASURE (enter code)	D. PROCESSES									
								(1) PROCESS CODES (enter)						(2) Process Description (If a code is not entered in D(1))			
22	0	P	0	4	2	10	P	S	0	1	S	0	2				
22	1	P	0	4	3	10	P	S	0	1	S	0	2				
22	2	P	0	4	4	10	P	S	0	1	S	0	2				
22	3	P	0	4	5	10	P	S	0	1	S	0	2				
22	4	P	0	4	6	10	P	S	0	1	S	0	2				
22	5	P	0	4	7	10	P	S	0	1	S	0	2				
22	6	P	0	4	8	10	P	S	0	1	S	0	2				
22	7	P	0	4	9	10	P	S	0	1	S	0	2				
22	8	P	0	5	0	10	P	S	0	1	S	0	2				
22	9	P	0	5	1	10	P	S	0	1	S	0	2				
23	0	P	0	5	4	10	P	S	0	1	S	0	2				
23	1	P	0	5	6	10	P	S	0	1	S	0	2				
23	2	P	0	5	7	10	P	S	0	1	S	0	2				
23	3	P	0	5	8	10	P	S	0	1	S	0	2				
23	4	P	0	5	9	10	P	S	0	1	S	0	2				
23	5	P	0	6	0	10	P	S	0	1	S	0	2				
23	6	P	0	6	2	10	P	S	0	1	S	0	2				
23	7	P	0	6	3	10	P	S	0	1	S	0	2				
23	8	P	0	6	4	10	P	S	0	1	S	0	2				
23	9	P	0	6	5	10	P	S	0	1	S	0	2				
24	0	P	0	6	6	10	P	S	0	1	S	0	2				
24	1	P	0	6	7	10	P	S	0	1	S	0	2				
24	2	P	0	6	8	10	P	S	0	1	S	0	2				
24	3	P	0	6	9	10	P	S	0	1	S	0	2				
24	4	P	0	7	0	10	P	S	0	1	S	0	2				
24	5	P	0	7	1	10	P	S	0	1	S	0	2				
24	6	P	0	7	2	10	P	S	0	1	S	0	2				
24	7	P	0	7	3	10	P	S	0	1	S	0	2				
24	8	P	0	7	4	10	P	S	0	1	S	0	2				
24	9	P	0	7	5	10	P	S	0	1	S	0	2				
25	0	P	0	7	6	10	P	S	0	1	S	0	2				



EPA ID Number (enter from page 1)

Secondary ID Number (enter from page 1)

W I D 9 8 8 5 8 0 0 5 6

## IV. Description of Hazardous Wastes (continued)

Line Number	A. EPA HAZARDOUS WASTE NO. (enter code)	B. ESTIMATED ANNUAL QUANTITY OF WASTE	C. UNIT OF MEASURE (enter code)	D. PROCESSES									
				(1) PROCESS CODES (enter)						(2) Process Description (if a code is not entered in D(1))			
25	1	P 0 7 7	10	P	S	0	1	S	0	2			
25	2	P 0 7 8	10	P	S	0	1	S	0	2			
25	3	P 0 8 1	10	P	S	0	1	S	0	2			
25	4	P 0 8 2	10	P	S	0	1	S	0	2			
25	5	P 0 8 4	10	P	S	0	1	S	0	2			
25	6	P 0 8 5	10	P	S	0	1	S	0	2			
25	7	P 0 8 7	10	P	S	0	1	S	0	2			
25	8	P 0 8 8	10	P	S	0	1	S	0	2			
25	9	P 0 8 9	10	P	S	0	1	S	0	2			
26	0	P 0 9 2	10	P	S	0	1	S	0	2			
26	1	P 0 9 3	10	P	S	0	1	S	0	2			
26	2	P 0 9 4	10	P	S	0	1	S	0	2			
26	3	P 0 9 5	10	P	S	0	1	S	0	2			
26	4	P 0 9 6	10	P	S	0	1	S	0	2			
26	5	P 0 9 7	10	P	S	0	1	S	0	2			
26	6	P 0 9 8	10	P	S	0	1	S	0	2			
26	7	P 0 9 9	10	P	S	0	1	S	0	2			
26	8	P 1 0 1	10	P	S	0	1	S	0	2			
26	9	P 1 0 2	10	P	S	0	1	S	0	2			
27	0	P 1 0 3	10	P	S	0	1	S	0	2			
27	1	P 1 0 4	10	P	S	0	1	S	0	2			
27	2	P 1 0 5	10	P	S	0	1	S	0	2			
27	3	P 1 0 6	10	P	S	0	1	S	0	2			
27	4	P 1 0 7	10	P	S	0	1	S	0	2			
27	5	P 1 0 8	10	P	S	0	1	S	0	2			
27	6	P 1 0 9	10	P	S	0	1	S	0	2			
27	7	P 1 1 0	10	P	S	0	1	S	0	2			
27	8	P 1 1 1	10	P	S	0	1	S	0	2			
27	9	P 1 1 2	10	P	S	0	1	S	0	2			
27	0	P 1 1 3	10	P	S	0	1	S	0	2			
28	1	P 1 1 4	10	P	S	0	1	S	0	2			





EPA ID Number (enter from page 1)

Secondary ID Number (enter from page 1)

W I D 9 8 8 5 8 0 0 5 6

## XIV. Description of Hazardous Wastes (continued)

Line Number	A. EPA HAZARDOUS WASTE NO. (enter code)	B. ESTIMATED ANNUAL QUANTITY OF WASTE	C. UNIT OF MEASURE (enter code)	D. PROCESSES										(2) Process Description (if a code is not entered in D(1))
				(1) PROCESS CODES (enter)										
28	2	P 1 1 5	10	P	S	0	1	S	0	2				
28	3	P 1 1 6	10	P	S	0	1	S	0	2				
28	4	P 1 1 8	10	P	S	0	1	S	0	2				
28	5	P 1 1 9	10	P	S	0	1	S	0	2				
28	6	P 1 2 0	10	P	S	0	1	S	0	2				
28	7	P 1 2 1	10	P	S	0	1	S	0	2				
28	8	P 1 2 2	10	P	S	0	1	S	0	2				
28	9	P 1 2 3	10	P	S	0	1	S	0	2				
29	0	U 0 0 1	10	P	S	0	1	S	0	2				
29	1	U 0 0 2	10	P	S	0	1	S	0	2				
29	2	U 0 0 3	10	P	S	0	1	S	0	2				
29	3	U 0 0 4	10	P	S	0	1	S	0	2				
29	4	U 0 0 5	10	P	S	0	1	S	0	2				
29	5	U 0 0 6	10	P	S	0	1	S	0	2				
29	6	U 0 0 7	10	P	S	0	1	S	0	2				
29	7	U 0 0 8	10	P	S	0	1	S	0	2				
29	8	U 0 0 9	10	P	S	0	1	S	0	2				
29	9	U 0 1 0	10	P	S	0	1	S	0	2				
30	0	U 0 1 1	10	P	S	0	1	S	0	2				
30	1	U 0 1 2	10	P	S	0	1	S	0	2				
30	2	U 0 1 4	10	P	S	0	1	S	0	2				
30	3	U 0 1 5	10	P	S	0	1	S	0	2				
30	4	U 0 1 6	10	P	S	0	1	S	0	2				
30	5	U 0 1 7	10	P	S	0	1	S	0	2				
30	6	U 0 1 8	10	P	S	0	1	S	0	2				
30	7	U 0 1 9	10	P	S	0	1	S	0	2				
30	8	U 0 2 0	10	P	S	0	1	S	0	2				
30	9	U 0 2 1	10	P	S	0	1	S	0	2				
31	0	U 0 2 2	10	P	S	0	1	S	0	2				
31	1	U 0 2 3	10	P	S	0	1	S	0	2				
31	2	U 0 2 4	10	P	S	0	1	S	0	2				



EPA ID Number (enter from page 1)

Secondary ID Number (enter from page 1)

W I D 9 8 8 5 8 0 0 5 6

## IV. Description of Hazardous Wastes (continued)

Line Number		A. EPA HAZARDOUS WASTE NO. (enter code)				B. ESTIMATED ANNUAL QUANTITY OF WASTE	C. UNIT OF MEASURE (enter code)	D. PROCESSES									
								(1) PROCESS CODES (enter)						(2) Process Description (If a code is not entered in D(1))			
31	3	U	0	2	5	10	P	S	0	1	S	0	2				
31	4	U	0	2	6	10	P	S	0	1	S	0	2				
31	5	U	0	2	7	10	P	S	0	1	S	0	2				
31	6	U	0	2	8	10	P	S	0	1	S	0	2				
31	7	U	0	2	9	10	P	S	0	1	S	0	2				
31	8	U	0	3	0	10	P	S	0	1	S	0	2				
31	9	U	0	3	1	10	P	S	0	1	S	0	2				
32	0	U	0	3	2	10	P	S	0	1	S	0	2				
32	1	U	0	3	3	10	P	S	0	1	S	0	2				
32	2	U	0	3	4	10	P	S	0	1	S	0	2				
32	3	U	0	3	5	10	P	S	0	1	S	0	2				
32	4	U	0	3	6	10	P	S	0	1	S	0	2				
32	5	U	0	3	7	10	P	S	0	1	S	0	2				
32	6	U	0	3	8	10	P	S	0	1	S	0	2				
32	7	U	0	3	9	10	P	S	0	1	S	0	2				
32	8	U	0	4	1	10	P	S	0	1	S	0	2				
32	9	U	0	4	2	10	P	S	0	1	S	0	2				
33	0	U	0	4	3	10	P	S	0	1	S	0	2				
33	1	U	0	4	4	10	P	S	0	1	S	0	2				
33	2	U	0	4	5	10	P	S	0	1	S	0	2				
33	3	U	0	4	6	10	P	S	0	1	S	0	2				
33	4	U	0	4	7	10	P	S	0	1	S	0	2				
33	5	U	0	4	8	10	P	S	0	1	S	0	2				
33	6	U	0	4	9	10	P	S	0	1	S	0	2				
33	7	U	0	5	0	10	P	S	0	1	S	0	2				
33	8	U	0	5	1	10	P	S	0	1	S	0	2				
33	9	U	0	5	2	10	P	S	0	1	S	0	2				
34	0	U	0	5	3	10	P	S	0	1	S	0	2				
34	1	U	0	5	5	10	P	S	0	1	S	0	2				
34	2	U	0	5	6	10	P	S	0	1	S	0	2				
34	3	U	0	5	7	10	P	S	0	1	S	0	2				



EPA I.D. Number (enter from page 1)

Secondary ID Number (enter from page 1)

W I D 9 8 8 5 8 0 0 5 6

## XIV. Description of Hazardous Wastes (continued)

Line Number	A. EPA HAZARDOUS WASTE NO. (enter code)	B. ESTIMATED ANNUAL QUANTITY OF WASTE	C. UNIT OF MEASURE (enter code)	D. PROCESSES						(2) Process Description (if a code is not entered in D(1))	
				(1) PROCESS CODES (enter)							
34	4	U 0 5 8	10	P	S	0	1	S	0	2	
34	5	U 0 5 9	10	P	S	0	1	S	0	2	
34	6	U 0 6 0	10	P	S	0	1	S	0	2	
34	7	U 0 6 1	10	P	S	0	1	S	0	2	
34	8	U 0 6 2	10	P	S	0	1	S	0	2	
34	9	U 0 6 3	10	P	S	0	1	S	0	2	
35	0	U 0 6 4	10	P	S	0	1	S	0	2	
35	1	U 0 6 6	10	P	S	0	1	S	0	2	
35	2	U 0 6 7	10	P	S	0	1	S	0	2	
35	3	U 0 6 8	10	P	S	0	1	S	0	2	
35	4	U 0 6 9	10	P	S	0	1	S	0	2	
35	5	U 0 7 0	10	P	S	0	1	S	0	2	
35	6	U 0 7 1	10	P	S	0	1	S	0	2	
35	7	U 0 7 2	10	P	S	0	1	S	0	2	
35	8	U 0 7 3	10	P	S	0	1	S	0	2	
35	9	U 0 7 4	10	P	S	0	1	S	0	2	
36	0	U 0 7 5	10	P	S	0	1	S	0	2	
36	1	U 0 7 6	10	P	S	0	1	S	0	2	
36	2	U 0 7 7	10	P	S	0	1	S	0	2	
36	3	U 0 7 8	10	P	S	0	1	S	0	2	
36	4	U 0 7 9	10	P	S	0	1	S	0	2	
36	5	U 0 8 0	10	P	S	0	1	S	0	2	
36	6	U 0 8 1	10	P	S	0	1	S	0	2	
36	7	U 0 8 2	10	P	S	0	1	S	0	2	
36	8	U 0 8 3	10	P	S	0	1	S	0	2	
36	9	U 0 8 4	10	P	S	0	1	S	0	2	
37	0	U 0 8 5	10	P	S	0	1	S	0	2	
37	1	U 0 8 6	10	P	S	0	1	S	0	2	
37	2	U 0 8 7	10	P	S	0	1	S	0	2	
37	3	U 0 8 8	10	P	S	0	1	S	0	2	
37	4	U 0 8 9	10	P	S	0	1	S	0	2	



EPA ID Number (enter from page 1)

Secondary ID Number (enter from page 1)

W I D 9 8 8 5 8 0 0 5 6

## XIV. Description of Hazardous Wastes (continued)

Line Number	A. EPA HAZARDOUS WASTE NO. (enter code)	B. ESTIMATED ANNUAL QUANTITY OF WASTE	C. UNIT OF MEASURE (enter code)	D. PROCESSES										(2) Process Description (if a code is not entered in D(1))
				(1) PROCESS CODES (enter)										
37	5	U 0 9 0	10	P	S	0	1	S	0	2				
37	6	U 0 9 1	10	P	S	0	1	S	0	2				
37	7	U 0 9 2	10	P	S	0	1	S	0	2				
37	8	U 0 9 3	10	P	S	0	1	S	0	2				
37	9	U 0 9 4	10	P	S	0	1	S	0	2				
38	0	U 0 9 5	10	P	S	0	1	S	0	2				
38	1	U 0 9 6	10	P	S	0	1	S	0	2				
38	2	U 0 9 7	10	P	S	0	1	S	0	2				
38	3	U 0 9 8	10	P	S	0	1	S	0	2				
38	4	U 0 9 9	10	P	S	0	1	S	0	2				
38	5	U 1 0 0	10	P	S	0	1	S	0	2				
38	6	U 1 0 1	10	P	S	0	1	S	0	2				
38	7	U 1 0 2	10	P	S	0	1	S	0	2				
	8	U 1 0 3	10	P	S	0	1	S	0	2				
38	9	U 1 0 5	10	P	S	0	1	S	0	2				
39	0	U 1 0 6	10	P	S	0	1	S	0	2				
39	1	U 1 0 7	10	P	S	0	1	S	0	2				
39	2	U 1 0 8	10	P	S	0	1	S	0	2				
39	3	U 1 0 9	10	P	S	0	1	S	0	2				
39	4	U 1 1 0	10	P	S	0	1	S	0	2				
39	5	U 1 1 1	10	P	S	0	1	S	0	2				
39	6	U 1 1 2	10	P	S	0	1	S	0	2				
39	7	U 1 1 3	10	P	S	0	1	S	0	2				
39	8	U 1 1 4	10	P	S	0	1	S	0	2				
39	9	U 1 1 5	10	P	S	0	1	S	0	2				
40	0	U 1 1 6	10	P	S	0	1	S	0	2				
40	1	U 1 1 7	10	P	S	0	1	S	0	2				
40	2	U 1 1 8	10	P	S	0	1	S	0	2				
40	3	U 1 1 9	10	P	S	0	1	S	0	2				
40	4	U 1 2 0	10	P	S	0	1	S	0	2				
	5	U 1 2 1	10	P	S	0	1	S	0	2				





EPA ID Number (enter from page 1)

Secondary ID Number (enter from page 1)

W I D 9 8 8 5 8 0 0 5 6

## XIV. Description of Hazardous Wastes (continued)

Line Number	A. EPA HAZARDOUS WASTE NO. (enter code)				B. ESTIMATED ANNUAL QUANTITY OF WASTE	C. UNIT OF MEASURE (enter code)	D. PROCESSES										(2) Process Description (if a code is not entered in D(1))
							(1) PROCESS CODES (enter)										
40	6	U	1	2	2	10	P	S	0	1	S	0	2				
40	7	U	1	2	3	10	P	S	0	1	S	0	2				
40	8	U	1	2	4	10	P	S	0	1	S	0	2				
40	9	U	1	2	5	10	P	S	0	1	S	0	2				
41	0	U	1	2	6	10	P	S	0	1	S	0	2				
41	1	U	1	2	7	10	P	S	0	1	S	0	2				
41	2	U	1	2	8	10	P	S	0	1	S	0	2				
41	3	U	1	2	9	10	P	S	0	1	S	0	2				
41	4	U	1	3	0	10	P	S	0	1	S	0	2				
41	5	U	1	3	1	10	P	S	0	1	S	0	2				
41	6	U	1	3	2	10	P	S	0	1	S	0	2				
41	7	U	1	3	3	10	P	S	0	1	S	0	2				
41	8	U	1	3	4	10	P	S	0	1	S	0	2				
	9	U	1	3	5	10	P	S	0	1	S	0	2				
42	0	U	1	3	6	10	P	S	0	1	S	0	2				
42	1	U	1	3	7	10	P	S	0	1	S	0	2				
42	2	U	1	3	8	10	P	S	0	1	S	0	2				
42	3	U	1	3	9	10	P	S	0	1	S	0	2				
42	4	U	1	4	0	10	P	S	0	1	S	0	2				
42	5	U	1	4	1	10	P	S	0	1	S	0	2				
42	6	U	1	4	2	10	P	S	0	1	S	0	2				
42	7	U	1	4	3	10	P	S	0	1	S	0	2				
42	8	U	1	4	4	10	P	S	0	1	S	0	2				
42	9	U	1	4	5	10	P	S	0	1	S	0	2				
43	0	U	1	4	6	10	P	S	0	1	S	0	2				
43	1	U	1	4	7	10	P	S	0	1	S	0	2				
43	2	U	1	4	8	10	P	S	0	1	S	0	2				
43	3	U	1	4	9	10	P	S	0	1	S	0	2				
43	4	U	1	5	0	10	P	S	0	1	S	0	2				
43	5	U	1	5	1	10	P	S	0	1	S	0	2				
J	6	U	1	5	2	10	P	S	0	1	S	0	2				



EPA ID Number (enter from page 1)

Secondary ID Number (enter from page 1)

W I D 9 8 8 5 8 0 0 5 6

## XIV. Description of Hazardous Wastes (continued)

Line Number	A. EPA HAZARDOUS WASTE NO. (enter code)				B. ESTIMATED ANNUAL QUANTITY OF WASTE	C. UNIT OF MEASURE (enter code)	D. PROCESSES										
							(1) PROCESS CODES (enter)						(2) Process Description (if a code is not entered in D(1))				
43	7	U	1	5	3	10	P	S	0	1	S	0	2				
43	8	U	1	5	4	10	P	S	0	1	S	0	2				
43	9	U	1	5	5	10	P	S	0	1	S	0	2				
44	0	U	1	5	6	10	P	S	0	1	S	0	2				
44	1	U	1	5	7	10	P	S	0	1	S	0	2				
44	2	U	1	5	8	10	P	S	0	1	S	0	2				
44	3	U	1	5	9	10	P	S	0	1	S	0	2				
44	4	U	1	6	0	10	P	S	0	1	S	0	2				
44	5	U	1	6	1	10	P	S	0	1	S	0	2				
44	6	U	1	6	2	10	P	S	0	1	S	0	2				
44	7	U	1	6	3	10	P	S	0	1	S	0	2				
44	8	U	1	6	4	10	P	S	0	1	S	0	2				
44	9	U	1	6	5	10	P	S	0	1	S	0	2				
45	0	U	1	6	6	10	P	S	0	1	S	0	2				
45	1	U	1	6	7	10	P	S	0	1	S	0	2				
45	2	U	1	6	8	10	P	S	0	1	S	0	2				
45	3	U	1	6	9	10	P	S	0	1	S	0	2				
45	4	U	1	7	0	10	P	S	0	1	S	0	2				
45	5	U	1	7	1	10	P	S	0	1	S	0	2				
45	6	U	1	7	2	10	P	S	0	1	S	0	2				
45	7	U	1	7	3	10	P	S	0	1	S	0	2				
45	8	U	1	7	4	10	P	S	0	1	S	0	2				
45	9	U	1	7	6	10	P	S	0	1	S	0	2				
46	0	U	1	7	7	10	P	S	0	1	S	0	2				
46	1	U	1	7	8	10	P	S	0	1	S	0	2				
46	2	U	1	7	9	10	P	S	0	1	S	0	2				
46	3	U	1	8	0	10	P	S	0	1	S	0	2				
46	4	U	1	8	1	10	P	S	0	1	S	0	2				
46	5	U	1	8	2	10	P	S	0	1	S	0	2				
46	6	U	1	8	3	10	P	S	0	1	S	0	2				
46	7	U	1	8	4	10	P	S	0	1	S	0	2				



EPA ID Number (enter from page 1)

Secondary ID Number (enter from page 1)

W I D 9 8 8 5 8 0 0 5 6

## IV. Description of Hazardous Wastes (continued)

Line Number	A. EPA HAZARDOUS WASTE NO. (enter code)	B. ESTIMATED ANNUAL QUANTITY OF WASTE	C. UNIT OF MEASURE (enter code)	D. PROCESSES						(2) Process Description (If a code is not entered in D(1))			
				(1) PROCESS CODES (enter)									
46	8	U 1 8 5	10	P	S	0	1	S	0	2			
46	9	U 1 8 6	10	P	S	0	1	S	0	2			
47	0	U 1 8 7	10	P	S	0	1	S	0	2			
47	1	U 1 8 8	10	P	S	0	1	S	0	2			
47	2	U 1 8 9	10	P	S	0	1	S	0	2			
47	3	U 1 9 0	10	P	S	0	1	S	0	2			
47	4	U 1 9 1	10	P	S	0	1	S	0	2			
47	5	U 1 9 2	10	P	S	0	1	S	0	2			
47	6	U 1 9 3	10	P	S	0	1	S	0	2			
47	7	U 1 9 4	10	P	S	0	1	S	0	2			
47	8	U 1 9 6	10	P	S	0	1	S	0	2			
47	9	U 1 9 7	10	P	S	0	1	S	0	2			
48	0	U 2 0 0	10	P	S	0	1	S	0	2			
48	1	U 2 0 1	10	P	S	0	1	S	0	2			
48	2	U 2 0 2	10	P	S	0	1	S	0	2			
48	3	U 2 0 3	10	P	S	0	1	S	0	2			
48	4	U 2 0 4	10	P	S	0	1	S	0	2			
48	5	U 2 0 5	10	P	S	0	1	S	0	2			
48	6	U 2 0 6	10	P	S	0	1	S	0	2			
48	7	U 2 0 7	10	P	S	0	1	S	0	2			
48	8	U 2 0 8	10	P	S	0	1	S	0	2			
48	9	U 2 0 9	10	P	S	0	1	S	0	2			
49	0	U 2 1 0	10	P	S	0	1	S	0	2			
49	1	U 2 1 1	10	P	S	0	1	S	0	2			
49	2	U 2 1 2	10	P	S	0	1	S	0	2			
49	3	U 2 1 3	10	P	S	0	1	S	0	2			
49	4	U 2 1 4	10	P	S	0	1	S	0	2			
49	5	U 2 1 5	10	P	S	0	1	S	0	2			
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49	7	U 2 1 7	10	P	S	0	1	S	0	2			
49	8	U 2 1 8	10	P	S	0	1	S	0	2			



EPA ID Number (enter from page 1)

Secondary ID Number (enter from page 1)

W I D 9 8 8 5 8 0 0 5 6

## XIV. Description of Hazardous Wastes (continued)

Line Number	A. EPA HAZARDOUS WASTE NO. (enter code)					B. ESTIMATED ANNUAL QUANTITY OF WASTE	C. UNIT OF MEASURE (enter code)	D. PROCESSES										(2) Process Description (if a code is not entered in D(1))
								(1) PROCESS CODES (enter)										
49	9	U	2	1	9	10	P	S	0	1	S	0	2					
50	0	U	2	2	0	10	P	S	0	1	S	0	2					
50	1	U	2	2	1	10	P	S	0	1	S	0	2					
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50	8	U	2	3	0	10	P	S	0	1	S	0	2					
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51	3	U	2	3	5	10	P	S	0	1	S	0	2					
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52	6	U	3	2	8	10	P	S	0	1	S	0	2					
52	7	U	3	5	3	10	P	S	0	1	S	0	2					
52	8	U	3	5	9	10	P	S	0	1	S	0	2					





EPA I.D. Number (enter from page 1)

W I D 9 8 8 5 8 0 0 5 6

Secondary ID Number (enter from page 1)

## XIV. Description of Hazardous Waste (continued)

E. USE THIS SPACE TO LIST ADDITIONAL PROCESS CODES FROM ITEM D(1) ON PAGE 6.

Line  
Number

Additional Process Codes (enter)

## XV. Map

Attach to this application a topographic map of the area extending to at least one mile beyond property boundaries. The map must show the outline of the facility, the location of each of its existing and proposed intake and discharge structures, each of its hazardous waste treatment, storage, or disposal facilities, and each well where it injects fluids underground. Include all springs, rivers and other surface water bodies in this map area. See instructions for precise requirements.

## XVI. Facility Drawing

All existing facilities must include a scale drawing of the facility (see instructions for more detail).

## XVII. Photographs

All existing facilities must include photographs (aerial or ground-level) that clearly delineate all existing structures; existing storage, treatment and disposal areas; and sites of future storage, treatment or disposal areas (see instructions for more detail).

## XVIII. Certification(s)

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

Owner Signature

*M. C. Vilione*

Date Signed

2-15-95

Name and Official Title (type or print)

Michael Vilione, General Partner

Operator Signature

*M. C. Vilione*

Date Signed

2-15-95

Name and Official Title (type or print)

Michael Vilione, President

## XIX. Comments

Additional owner information:

Megal Development Corporation

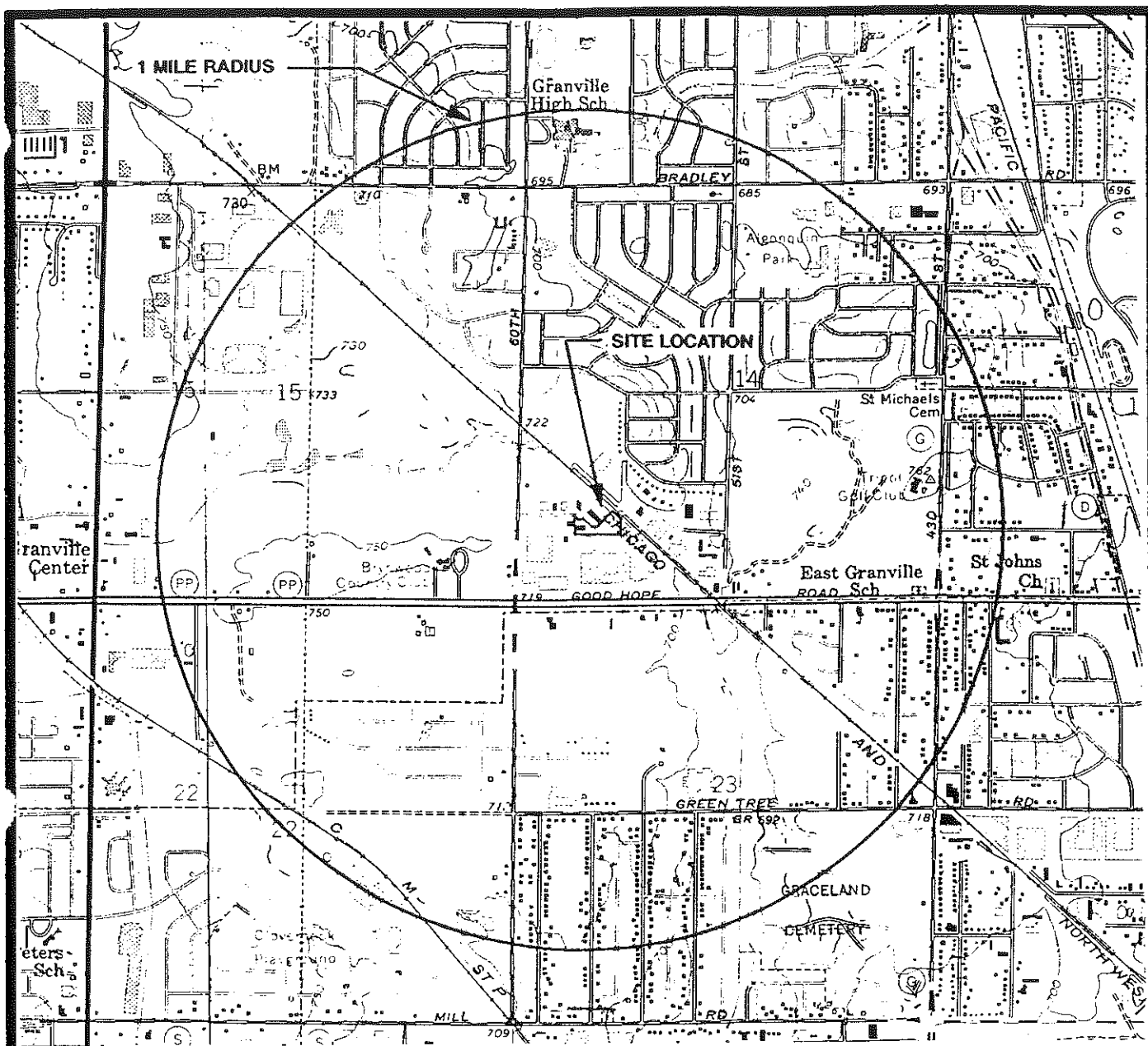
P.O. Box 18661

Milwaukee, WI 53218

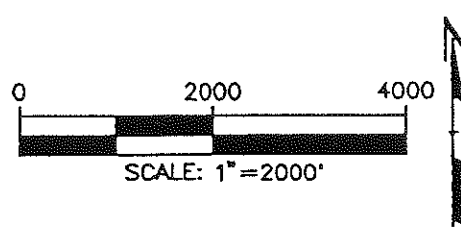
(414) 781-9775

Note: Mail completed form to the appropriate EPA Regional or State Office. (refer to instructions for more information)





**STATE LOCATION**



**EOG DISPOSAL, INC.  
SITE LOCATION MAP**

**SOURCE: BASE MAP FROM MEMOMONEE AND  
THIENSVILLE, WISCONSIN 7.5 MINUTE USGS  
USGS QUADRANGLES.**



DWN. BY: DPR
DATE: OCTOBER, 1992
PROJ.# 2648.02
FILE #

**FIGURE 1**



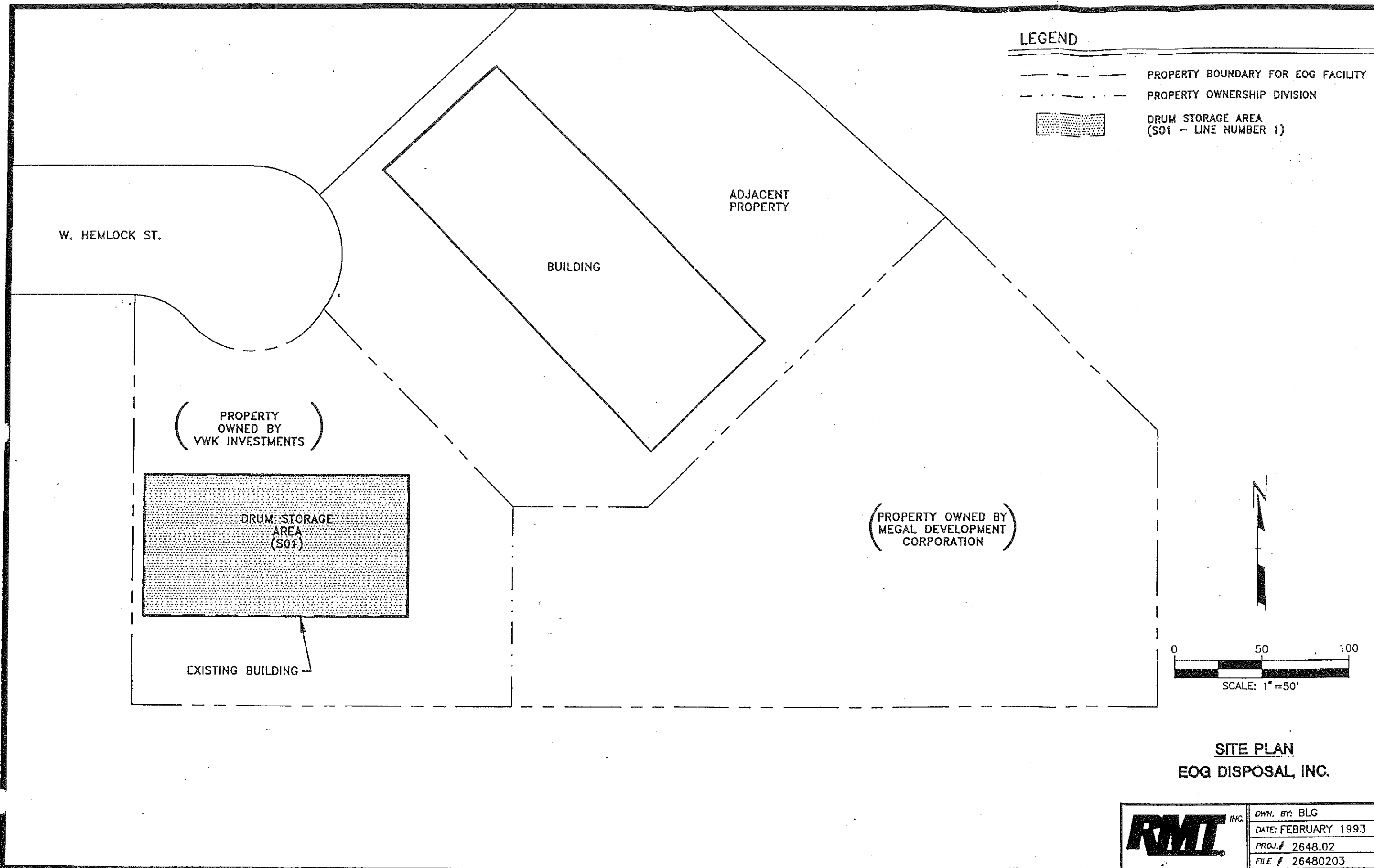
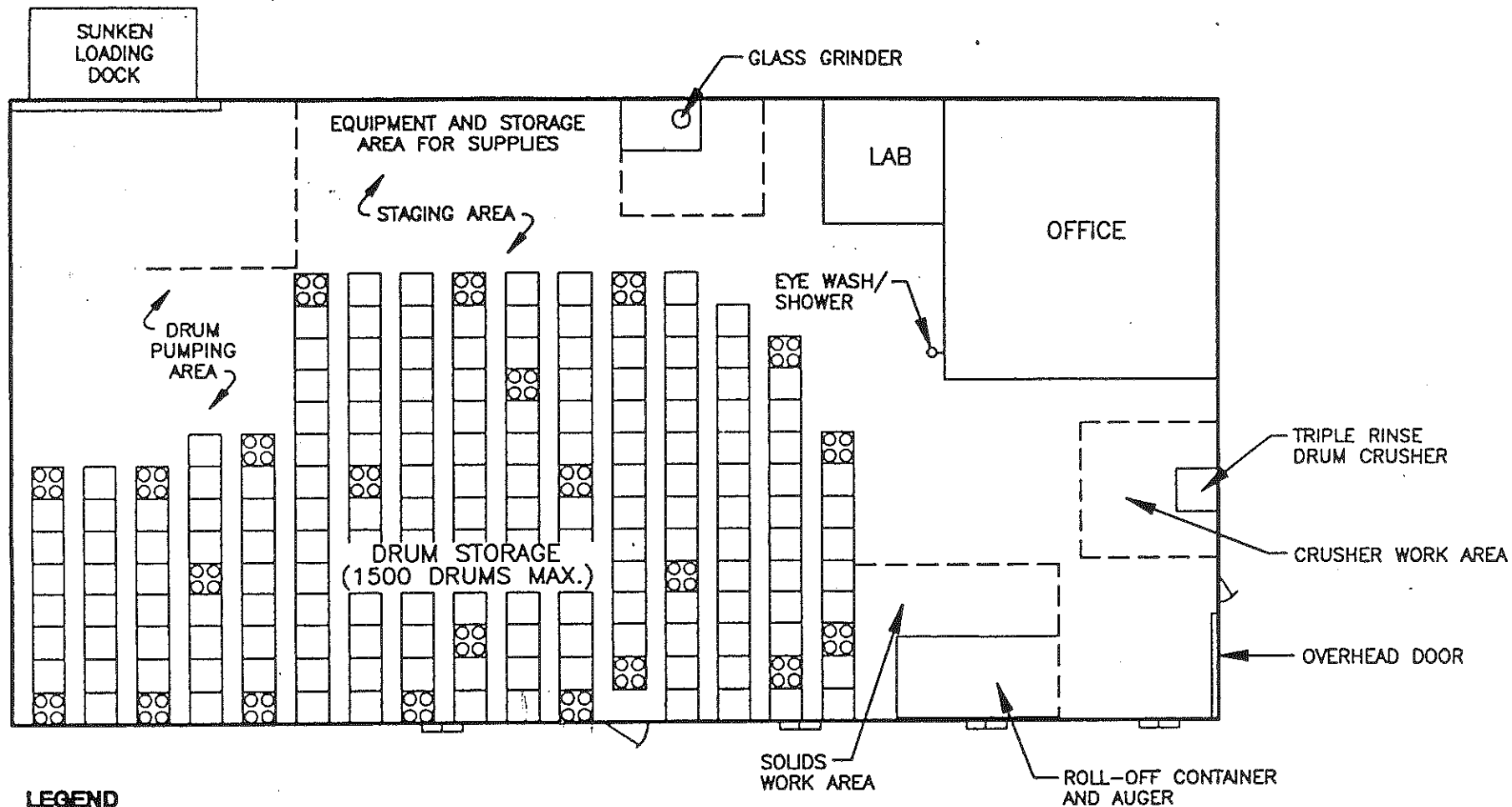


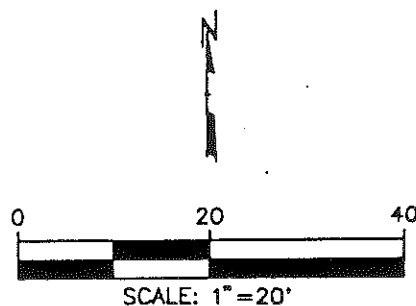
FIGURE 2





#### NOTE

SOURCE: FROM PLAN MODIFICATION, MILWAUKEE TRANSFER STATION, BY WARZYN ENGINEERING INC., 7/91.



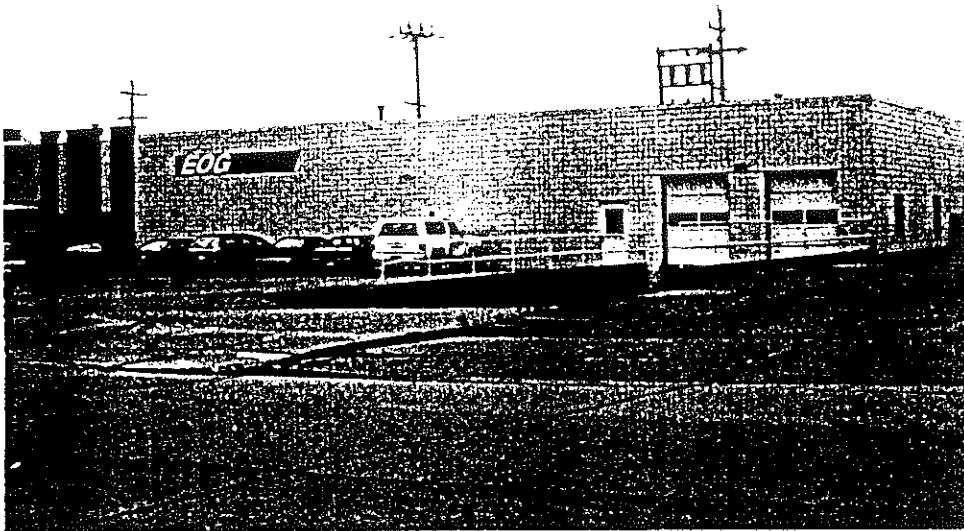
#### FACILITY LAYOUT EOG DISPOSAL

	DWN. BY: BLG
	DATE: FEBRUARY 1993
	PROJ. # 2648.02
	FILE # 26480204

FIGURE 3







LOOKING SOUTHEAST AT THE FACILITY.  
PHOTOGRAPH TAKEN 11/09/92.



LOOKING WEST AT THE DRUM STORAGE AREA (SECTION X11, S01, LINE 1).  
PHOTOGRAPH TAKEN 11/09/92.



ATTACHMENT 2



**ATTACHMENT 2: NEEDS ASSESSMENT**

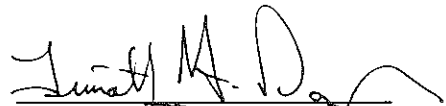


**STATEMENT OF NEEDS**

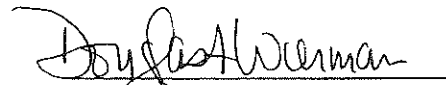
*Prepared for:*  
**EOG DISPOSAL, INC.**  
**MILWAUKEE, WISCONSIN**

*Prepared by:*  
**RMT, INC.**  
**WAUKESHA, WISCONSIN**

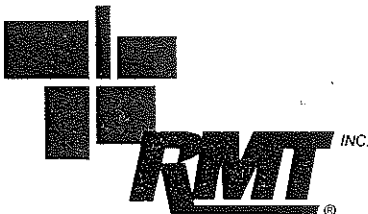
**SEPTEMBER 1994**



Timothy H. Danzer, C.H.M.M.  
Project Environmental Scientist



Douglas A. Wierman, C.P.G.  
Project Manager



**RESIDUALS MANAGEMENT TECHNOLOGY, INC. — CHICAGO**

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## STATEMENT OF NEEDS

### 1. Introduction

EOG has submitted this Feasibility Report and Plan of Operation (FRPO) to WDNR for review as required by Wisconsin Statutes, chapter 144. This Statement of Needs includes a statement explaining the need for approval of the EOG facility and the hardships which might result without EOG's services to its clientele.

The most direct means of recycling is by re-directing unwanted products to people who can use them. Companies often buy too much of a certain product or change their manufacturing process and no longer need that product. Used oil and other recyclable materials eventually become so old that they are unusable for their intended purposes. It is time consuming and costly for a company to individually find a user outside of their organization for these unwanted or off-spec products. These companies usually find that disposal of these unwanted products is much more cost effective. EOG has nationwide contacts with industries which have specific product needs and any of these unwanted products can fulfill the needs of these other users.

Some materials simply cannot be recycled because they either have no reclamation value or a user cannot be located within a reasonable amount of time. In these cases, fortunately, the recycling process is not limited to reuse. These waste materials can become resources for "co-processing". Co-processing is any manufacturing process which uses waste materials in either a single or combined operation to produce a product. Cement manufacturing is one of the largest co-processing industries. Organic liquid wastes replace nonrenewable fossil fuels as the energy source for kiln operation. Wastewaters are used for cooling and make-up water in the cement making process. Wastes used in co-processing not only contribute to the production of an essential product, but conserve natural resources. Co-processing has been hailed by the EPA as one of the most viable waste recycling technologies in existence today.

### 2. Waste Capacity and Demand

Based on the State of Wisconsin Hazardous Waste Capacity Assurance Plan (October, 1989), Wisconsin has a limited number of in-state commercial hazardous waste management facilities. These facilities are primarily involved in solvent reclamation. A limited number of liquid incineration and aqueous inorganic treatment also takes place in Wisconsin. As a result, Wisconsin has a shortfall in hazardous waste management capacity.



In the future, competition for remaining hazardous waste landfill space is expected to increase. Correspondingly, disposal costs will also increase. The activities conducted at EOG's facility are based on the objective of redirecting materials from waste streams for the purpose of beneficial use whenever possible, thus reducing the amount of wastes disposed in landfills.

**3. Approximate Service Area**

EOG is a full service waste consulting firm, located in Milwaukee, Wisconsin with branch offices in Westmont, Illinois, Minneapolis, Minnesota, Salt Lake City, Utah and College Station, Texas. Each of these branch offices has an Account manager that is responsible for sales within that specific region. These sales offices will be directing drums from their clients to EOG's Milwaukee facility for processing. EOG currently serves over 1,300 clients which include a variety of commercial, institutional, governmental and industrial companies nationwide that do not generate bulk quantities of waste. The primary function of this facility is bulking and transfer of hazardous and nonhazardous wastes in order to gain access to secondary markets. Table 1 outlines specific areas of current EOG clientele. No other permitted facilities in the geographic proximity to EOG would offer the diversity of hazardous waste recycling, nor the distribution of service.

**4. Quantity of Waste Suitable for Handling at EOG within the Service Area**

EOG currently has the capacity to store up to 39,600 gallons of hazardous waste in 55-gallon drums. Once construction for the proposed additions are completed, EOG will have an additional 48,000 gallons of storage capacity in four 12,000-gallon aboveground tanks, 11,000 gallons of storage capacity in two 5,500-gallon aboveground storage tanks, and 22,880 gallons of additional drum storage. It is EOG's policy to manage these wastes in the most efficient and cost effective way possible, making sure that no backlog of wastes is stored on-site for extended periods of time.

**5. Design Capacity of Certain Facilities Located Within the Service Area**

Because EOG's service area extends throughout the United States, the design capacity of other recycling facility capacities should not be affected significantly.

**6. Economic Considerations**

Waste disposal costs continue to rise nationally as Congress expands the list of wastes which are restricted from land disposal and as waste capacity continues to decrease.



The purpose of EOG's facility is to re-direct waste streams for the purpose of beneficial re-use whenever possible. The recycling of most of the materials which are handled at EOG is most cost effective when managed in bulk quantities. The materials received at EOG are primarily generated by commercial, institutional and industrial companies which do not generate bulk quantities. Currently, these wastes are often solidified and disposed of in landfills. Much of this waste can be diverted from landfills and incinerators into various recycling processes or beneficial reuse products. The purpose of EOG's reclamation, bulking and fuel blending facility is to collect and direct both nonhazardous and hazardous wastes into recycling processes. This presents a very attractive alternative to disposing these waste in landfills or for the high costs of incineration.

#### 7. Conclusions

EOG strives to seek more sophisticated and economical means of servicing the hazardous waste management industry. As process equipment improves, as Congress expands the list of wastes restricted from land disposal, and as EOG's existing and future clientele waste needs evolve and expand, EOG must upgrade its facility to remain responsive and competitive, and continue providing an environmentally acceptable and secure means of recycling and/or processing nonhazardous and hazardous wastes.





Table 1 OUTLINE OF EOG CLIENTELE	
GENERATOR	LOCATION
DSM Desotech	Elgin, Illinois
Furnas Electric	Batavia, Illinois
Zenith Electronic	Chicago, Illinois
City Colleges of Chicago	Chicago, Illinois
College of DuPage	Glen Ellyn, Illinois
Kraft - Naperville	Naperville, Illinois
Bawden Printing	Eldridge, Iowa
Abbott Laboratories	Abbott Park, Illinois
Indiana University - Bloomington	Bloomington, Indiana
Siemens Power Corporation	Hammond, Indiana
Meyercord	Northbrook, Illinois
Kraft General Foods	Battle Creek, Michigan
University of Wisconsin	LaCrosse, Wisconsin
University of Wisconsin	Madison, Wisconsin
Steeltech	Milwaukee, Wisconsin
Falk Corporation	Milwaukee, Wisconsin
Wisconsin Pharmacal	West Bend, Wisconsin
SC Johnson Wax	Sturtevant, Wisconsin
Xymox Technologies Inc.	Milwaukee, Wisconsin
Eaton Corporation	Milwaukee, Wisconsin
Scott World Wide Food Service	Oshkosh, Wisconsin
Wisconsin Color Press	Milwaukee, Wisconsin
Wisconsin Pharmaceutical	Jackson, Wisconsin
Zimmermann Printing	Sheboygan, Wisconsin
Serigraph, Incorporated	West Bend, Wisconsin



Table 1	
OUTLINE OF EOG CLIENTELE	
GENERATOR	LOCATION
Victory Graphics	Milwaukee, Wisconsin
Accurate Printing Company	Kenosha, Wisconsin
Printing Developments	Racine, Wisconsin
Shinners Publication	Brookfield, Wisconsin
Dri-Tec, Incorporated	Milwaukee, Wisconsin
Menasha Corporation	Neenah, Wisconsin
Henzen Coatings	Milwaukee, Wisconsin
Janesville Gazette	Janesville, Wisconsin
Beck Carton Corporation	Milwaukee, Wisconsin
North Hills Country Club	Milwaukee, Wisconsin
Action Printing	Fond Du Lac, Wisconsin
Moore Response Marketing	DePere, Wisconsin
Demco, Incorporated	Deforest, Wisconsin
Vanier Graphic Corporation	Sussex, Wisconsin
Wolkerstorfer Corporation	New Brighton, Minnesota
Pefco, Inc.	St. Paul, Minnesota
World Aerospace	Maple Grove, Minnesota
Burlington Northern Railroad	Minneapolis, Minnesota
Schmidt Printing	Rochester, Minnesota
GML Incorporated	St. Paul, Minnesota
Precision Press	North Mankato, Minnesota
Scoville Press	Plymouth, Minnesota
Rhone - Poulenc	Baltimore, Maryland
Universal Packaging	Saratoga Springs, New York
DA Stuart	Philadelphia, Pennsylvania



Table 1 OUTLINE OF EOG CLIENTELE	
GENERATOR	LOCATION
Volvo GM	Dublin, Virginia
University of Central Florida	Orlando, Florida
University of Florida	Gainsville, Florida
Barry Grant Fuel Systems	Dahlonaga, Georgia
New Mexico Tech.	Socorro, New Mexico
University of New Mexico	Albuquerque, New Mexico
DA Stuart Company	Los Angeles, California
Weber State University	Ogden, Utah
Salt Lake Community College	Salt Lake City, Utah
Snow College	Ephraim, Utah
Utah DOT	Salt Lake City, Utah
University of Utah	Salt Lake City, Utah
Terratech, Inc.	Salt Lake City, Utah
Granite School District	Salt Lake City, Utah
North Dakota State University	Fargo, North Dakota
Idaho State University	Pocatello, Idaho
Idaho School District	Idaho Falls, Idaho
Bannock Regional Medical Center	Pocatello, Idaho
Tarleton State University	Stephenville, Texas
Southwest Texas State University	San Marcos, Texas
Texas DOT	Waco, Texas
IBT - Houston	Houston, Texas
Texas A&M	College Station, Texas
Medical Center Hospital	Odessa, Texas
Shannon Medical Center	San Angelo, Texas









**ATTACHMENT 3: GENERAL FACILITY DESCRIPTION**

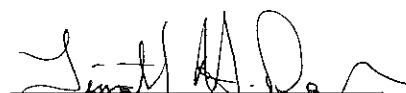


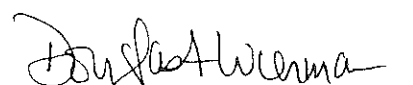
**GENERAL FACILITY DESCRIPTION**

*Prepared for:*  
**EOG DISPOSAL, INC.**  
**MILWAUKEE, WISCONSIN**

*Prepared by:*  
**RMT, INC.**  
**WAUKESHA, WISCONSIN**

**SEPTEMBER 1994**

  
Timothy H. Danzer, C.H.M.M.  
Project Environmental Scientist

  
Douglas A. Wierman, C.P.G.  
Project Manager



**RESIDUALS MANAGEMENT TECHNOLOGY, INC. — CHICAGO**

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Appendix D	Historical and Archeological Correspondence
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Appendix F	Lease Agreement Between EOG and Megal Corporation





Section 1

**GENERAL DESCRIPTION**

The purpose of both the existing and proposed facility is to conduct exempt recycling of hazardous waste materials, including combustible waste, laboratory wastes, waste oil, paint waste, solvent waste, and other organic and inorganic materials. The activities conducted at this facility are based on a very simple concept--the re-direction of materials from the waste stream for the purpose of beneficial reuse whenever possible. The materials received at this facility are primarily generated by commercial, institutional and industrial companies that generally do not generate bulk quantities. Therefore, the function performed by this facility is primarily the bulking and transfer of hazardous and nonhazardous wastes in order to gain access to secondary markets. Organic materials make up the majority of the materials accepted at EOG. Some of the organic materials are recycled by EOG for re-refining or energy recovery as a fuel for industrial furnaces, or some are recycled by separate off-site licensed facilities. EOG will also accept corrosives and other hazardous and non-hazardous materials at their facility. Both liquid and solid materials are processed at this location. The facility will also accept laboratory chemicals (labpacks) for repackaging and/or bulking to allow for the cost effective re-direction of these materials for the purpose of beneficial use (i.e. fuel blending, metal recovery, neutralization, etc.) where possible.

The current layout of the facility is depicted in Sheet 1 of 18. The proposed expanded facility will include a Bulk Liquid Storage Tank Unit, a Lab Pack Repack and Bulking Unit, additional Container Storage Unit capacity, and a Bulk Solids Storage Unit, as shown on Sheet 2 of 18.

**GENERAL FACILITY INFORMATION**

Name and location of Facility:

EOG Disposal, Inc.  
5611 West Hemlock Street  
Milwaukee, WI 53223  
Phone: (414) 353-1156

Property Owner:

VK Investments  
5611 West Hemlock Street  
Milwaukee, WI 53223  
Phone: (414) 353-1156



GENERAL DESCRIPTION  
EOG DISPOSAL, INC.

SEPTEMBER 1994  
REVISED FEBRUARY 24, 1995

Facility Operator:

Michael Villione, President  
EOG Disposal, Inc.  
5611 West Hemlock Street  
Milwaukee, WI 53223  
Phone: (414) 353-1156

Leased Property Owner:

Megal Development Corp.  
12650 West Lisbon Road  
Brookfield, WI 53005  
Phone: (414) 781-9775

Authorized Contact:

Michael Villione, President  
EOG Disposal, Inc.  
Phone: (414) 353-1156



## Section 2 TOPOGRAPHY

The topography of the existing facility is shown in on Sheet 1 of 18. As shown on Sheet 2 of 18 the proposed facility will have similar topographic features.

### 2.1 Surface Water

Based on a map of site topography prepared for the site and surrounding area (see Sheet 3 of 18), there is approximately 23 feet of relief across the site. The ground surface drops from the highest point on the site, 733.4 feet above mean sea level (MSL) to approximately 710 feet above MSL on the southeast side of the site and approximately 720 feet above MSL on the northern boundary of the site. The majority of the site is flat at approximately 733 feet above MSL. The area of the proposed tank farm and lab pack building have been rough graded. Present on the northern/northeastern boundary of the site are Chicago and Northwestern Railroad tracks with an elevated grade. The railroad trends northwest to southeast. This railroad grade influences site surface water runoff in that the lowest part of the site is adjacent to the south side of this grade. This causes site drainage to occur to the southeast along this railroad grade. There are no surface water bodies on-site.

### 2.2 Land Use and Zoning

The EOG facility is bounded on the north by Design Specialties and ARKO, a manufacturer of fireplaces and a dog training center, respectfully; on the northeast by the Chicago and Northwestern Railroad; on the east and south by Packaging Corporation of America, a manufacturer of cardboard boxes; on the west by Centercom, a reproducer of video tapes and on the northwest by Hellers Carbonic of Milwaukee, distributors of dry ice. There are approximately 281 single family residential homes, 41 multi-family dwellings, and approximately 50 commercial/industrial establishments located within 0.5-miles of the facility (see Sheet 4 of 18). The more heavily populated residential subdivisions begin approximately 0.2 miles northeast of the facility across the railroad tracks. A Plat Map indicating property boundaries within 0.5 miles of the facility is provided as Sheet 5 of 18 and a list of property owners within 0.5 miles is contained in Appendix A.

No nursing homes or hospitals are located within a 1/2 mile radius of the EOG facility. There are two country clubs; to the west, approximately 810 feet from the EOG facility is Brynwood Country Club and to the east, approximately 1,350 feet from the EOG facility is Tripoli Golf Club no other parks or



recreational areas are known to exist within a 1/2 mile radius of the EOG facility. Sheet 6 of 18 of Attachment 15 shows the location of these country clubs in relation to the EOG facility

Zoning maps provided by the City of Milwaukee Department of City Development (see Sheet 6 of 18) show that the facility is zoned for industrial use, which is consistent with the present and proposed facilities. The properties surrounding the EOG facility are currently used for manufacturing, warehousing, and other commercial activities. Surrounding property owners include:

North of EOG

5606 W. Hemlock Street  
Megal Development Corp.  
P.O. Box 18661  
Milwaukee, WI 53218

Northeast of EOG

5601 W. Hemlock Street  
Megal Development Corp.  
12650 Lisbon Road  
Brookfield, WI 53005

East/Southeast of EOG

5400 W. Good Hope Road  
Aid Association for Lutherans  
5400 W. Good Hope Road  
Milwaukee, WI 53223

West of EOG

5621 W. Hemlock Street  
Centercom Wisconsin, Inc.  
5737 W. Hemlock Street  
Milwaukee, WI 53223

South of EOG

5600 W. Good Hope Road  
PCA Box Company  
P.O. Box 672346  
Houston, TX 77267

### 2.3 Legal Description

The EOG facility is located in a primarily industrial area within the city of Milwaukee, Wisconsin, at a location east of the intersection of West Hemlock Street and 60<sup>th</sup> Street, as shown on Sheet 2 of 18. The geographic coordinates of this location are north latitude 43°09'006" and longitude 87°59'001". A map depicting the legal boundaries of the property on which the facility is located is included as Sheet 2 of 18.

The legal description for the site is:

That part of the Southwest 1/4 of Section 14, T.8N., R.21E., in the City of Milwaukee, County of Milwaukee and State of Wisconsin. Commencing at the Southwest corner of the said 1/4 section; thence, N.2° 07' 15" E. on the West line of the said 1/4 section, 872.59 feet to a point; thence S.89° 59' 50" E., and parallel to the south line of the said 1/4 section, 745.03 feet to the Southwest corner of Lot 8, Block 1, Megal Good Hope Industrial Park, a subdivision of the said 1/4 section; being also the place of beginning of the land to be described; thence N.0° 01' 20" W., along the West line of Lot 8, 233.37 feet to a point; thence Southeasterly along the arc of the curve (Radius of 40 feet and bears S.0° 01' 20" E., and Long Chord is 32.46 feet and bears S.65° 51' 48" E.), 33.45 feet to a point; thence Northeasterly along the arc of the curve (Radius of 50 feet and bears N.48° 17' 44" E., long chord of 77.47 feet and bears N.87° 30' 51"





E.), 88.63 feet to a point; thence Northeasterly along the arc of a curve (Radius of 50 feet and bears N.53° 16' 02" W., long chord of 64.91 feet and bears N.3° 44' 32" E.), 70.64 feet to a point; thence N.45° 46' 58" E., along the Northwesterly line of Lot 7, to the Northeasterly corner of said Lot 7, 236.79 feet to a point; thence S.47° 21' 54" E., along the Northeasterly line of said Lot 7, 436.34 feet to a point; thence S.2° 04' 23" W., along the Easterly line of said Lots 7 and 8, 158.05 feet to a point; thence N.89° 59' 50" W., along the South line of said Lot 8, 587.60 feet to the place of beginning.

The property on which the EOG facility is located covers approximately three acres.

## **2.4 Access Control**

### **2.4.1 Control of Unauthorized Entry**

The proposed facility will be entirely fenced with a 6-foot high chain-link fence (see Sheet 2 of 18). The fence line north of the process/storage building has two 30-foot vehicle gates and the fence line perpendicular to the leased office space on the north end of the property has a 30-foot vehicle gate. These gates will be monitored by a closed-circuit video surveillance system and are opened and closed to permit entry (and egress) of waste delivery trucks and other authorized entry. In addition, there will be a pedestrian gate on the western fence line running between the process/storge building and the leased office space. All gates will be kept closed and locked during non-operating hours of the facility.

During operating hours, all persons entering the facility are required to enter the office building, state their business to the receptionist, and sign a visitor's log. In the case of waste or materials delivery trucks, the delivery will be accepted (or tentatively accepted in the case of waste deliveries) prior to being directed and/or escorted through the facility. All noncomplying entrants are treated as unauthorized entrants and are asked to leave the facility. Unauthorized entrants are detected by facility personnel.

During nonoperating hours, the fence and locked gates control unauthorized entry to the facility.

### **2.4.2 Control of Authorized Entry**

Drivers of trucks delivering wastes to the facility are given specific instructions at the main office about where to proceed within the facility to be inspected and/or sampled and off-



loaded. All waste off-loading is conducted under the supervision of a Operation's Manager or other designated personnel.

Drivers of trucks delivering supplies and non-waste materials and service vehicles are escorted to their designations on the facility by designated personnel.

Contractors, consultants, visitors and other non-employee personnel authorized to enter the facility normally are accompanied by facility personnel while on the premises. Possible exceptions may occur where an individual has a prolonged and very specific job to perform in a specific area of the facility (e.g., building construction). In these cases, facility personnel familiarize the person with the facility and safety/emergency procedures to be followed while on site.

#### **2.4.3 Warning Signs**

Signs are posted at all points of entry to the facility at 50-foot intervals in the perimeter fencing. The signs can be seen when approaching the facility at a distance of 25 feet, and contain the words "Danger - Unauthorized Personnel Keep Out".

### **2.5 Location of Buildings**

Sheet 3 of 18 contains a detailed topographic survey map covering the existing facility and surrounding area. It has a scale of 1 inch = 200 feet, a 2-foot contour interval, and elevations based on USGS datum. This plan sheet includes the property and site boundaries; a survey grid and north arrow; homes, buildings, man-made features and utility line; fences and gates; and other pertinent features such as watercourses and railroad lines. Water supply wells are also shown on Sheet 3 of 18, and are contained in Appendix B.

The layout of the operating units, other buildings and structures, fences, and other features of the existing and proposed facilities are illustrated in greater detail in Sheets 1 through 18.

The physical layout of the existing facility is shown in Sheet 1 of 18. As shown, the facility currently consists of (1) a container storage unit, (2) a container processing system, (3) a laboratory, and (4) administrative offices.



The layout of the proposed expanded facility is shown on Sheet 2 of 18. The expanded facility will consist of the following regulated units:

- 1) A Container Storage Unit
- 2) A Bulk Liquid Storage Unit
- 3) A Bulk Solids Storage Unit (Roll-Off Box/Lugger Box Storage)
- 4) A Waste Blending Area
- 5) A Lab Pack Repackaging and Bulking Building
- 6) A Laboratory

These units are described further in the Process Information Section of this Feasibility and Plan of Operation Report.

Non-regulated units, including the administration offices and maintenance areas, will be expanded in the proposed facility additions (see Sheet 2 of 18). The maintenance areas will be used for repairing equipment and storage of parts and supplies. The expanded facility will have a perimeter fence as described in Subsection 2.4.1 of this report.



### Section 3 CLIMATOLOGY

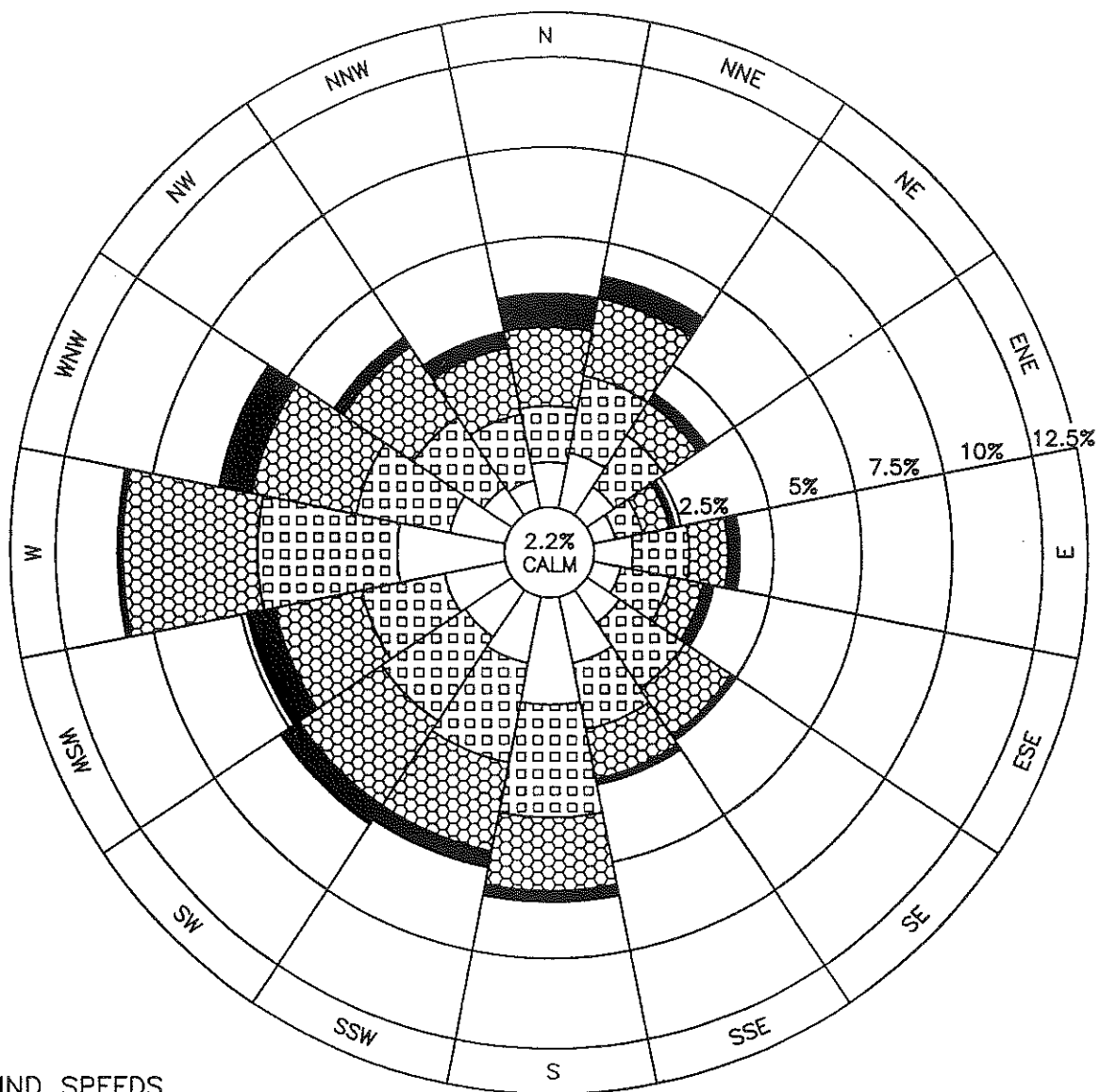
The EOG facility is located in the southeast section of the state of Wisconsin which usually has warm summers and mild winters due to the area's proximity to Lake Michigan. Summer temperatures are typically in the 68°F to 73°F range and winter temperatures are typically mild in the 19°F to 26°F range as reflected by the July/August and January/February monthly means.

The average annual total precipitation in southeastern Wisconsin is 31.26 inches, expressed as water equivalent. Only 19.2 percent of the average annual total precipitation is snowfall. Prevailing winds in the region follow a clockwise pattern in terms of the prevailing direction over seasons of the year, being northwesterly in the late fall and winter, northeasterly in the spring, and southwesterly in the summer and early fall. Wind velocities in southeastern Wisconsin may be expected to be less than 5 miles per hour about 15 percent of the time, between 5 and 25 miles per hour about 60 percent of the time, and an excess of 15 miles per hour about 26.5 percent of the time.

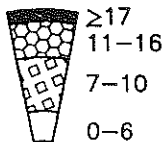
Figure 1 presents wind direction data (wind-rose) for the region. As shown by the wind rose, the region exhibits a rather uniform distribution of wind direction, that is, there are not extreme differences in the frequency of wind directions. Based on averages of the indicated percentages, the wind may be expected to blow from the southwest and northwest each about 20 percent of the time.







WIND SPEEDS  
(KNOTS)



29,215 OBSERVATIONS  
MILWAUKEE, WI  
1965-1974

WIND ROSE  
EOG  
MILWAUKEE, WI


	DWN. BY: DKJ
	APPROVED BY: <i>TAD</i>
	DATE: JULY 1994
	PROJ. # 3057.01
	FILE # 30570183

FIGURE 1



Section 4  
LOCATION STANDARDS

Because of the character of EOG's current and proposed operations, the facility does not affect groundwater or surface water and has negligible potential to do so. The suitability of the site for its present and proposed operations has been reviewed and approved by all affected municipalities.

**4.1 Flood Plain Standards**

The facility appears on the Federal Insurance Administration (FIA) Map Number 550278 0018 C covering Milwaukee, Wisconsin (Sheet 7 of 18). This map shows that the facility is not located in a 100-year floodplain; therefore, the facility meets the locational requirements of Wisconsin Administrative Code (WAC) NR 630.18(1) and no floodplain related limitations on site development are invoked. According to the FIA map, the facility is located in Zone C (areas of minimal flooding). To the east of the facility, across the Chicago and Northwestern Railroad is Lincoln Creek which runs through an area zoned as A2. Areas with an A2 zone designation are described by the Federal Emergency Management Agency (FEMA) as areas within a 100-year floodplain. Base flood elevations for this area range between 696 and 708. Elevations of the facility range from 734 to 720, which is significantly higher topographically than the floodplain base flood elevations.

**4.2 Wetland Standards**

The facility appears on the Wisconsin Wetlands Inventory Map for Township 8 North, Range 21 East, covering Milwaukee, Wisconsin (Sheet 7 of 18). This map shows that the facility has no wetlands; therefore, the facility meets the locational requirements of WAC NR 630.18 (2) and no wetland related limitations on site development are invoked. According to the Wetland Inventory Map, several wetland areas smaller than two acres in size are located approximately 1,300 feet northwest of the facility. In addition, an artificially excavated, open water, wet soil, Palustrine wetland area is located approximately 4,200 feet southwest of the facility. Due to the distance of the above mentioned wetland areas from the facility, it is anticipated that minimal impacts, if any, to Wisconsin wetlands would occur due to EOG operations.

**4.3 Endangered Species Habitat Standards**

A letter along with topographic map and legal description was sent to the Bureau of Endangered Resources on July 11, 1994 requesting a report documenting the absence of concern species critical



habitat. According to the Bureau's response, no occurrence records of Endangered, Threatened, or Special Concern species or natural communities, nor for any State Natural Areas were identified for the subject property by the Natural Heritage Inventory data files. A copy of this letter as well as the response is included in Appendix C.

#### **4.4     Seismic Standards**

According to the Wisconsin Geological and Natural History Survey (WGNHS) and the U.S. Geological Survey (USGS), based on bedrock and surficial geologic field studies, no faults of Holocene age have been identified in the area of the facility. Based on the USGS Open File Report 82-1033, "Preliminary Map of Horizontal Acceleration in Rock with 90 Percent Probability of Not Being Exceeded in 250 Years", the WGNHS and USGS conclude that all of Wisconsin falls within a zone of between 5 and 9 percent horizontal acceleration. In addition, according to WGNHS, the rock underlying the area of the facility consists of Devonian and Silurian dolomite, and the Milwaukee area is not known to be extensively karsted.

Since the facility is located in Milwaukee County, Wisconsin, which is not listed in Appendix VI of 40 CFR part 264, no further information is therefore required to demonstrate compliance with the seismic considerations.

#### **4.5     Historical and Archeological Sites**

A letter along with site specific information was sent to the State Historical Society of Wisconsin, Division of Historic Preservation on June 20, 1994 requesting information on historical and archeological sites in the area of the site. According to their response, there are no known archeological sites in the project area. Based on the nature and scope of the project, the Society believes that an archeological survey is not warranted. Furthermore, this project will not affect any structures that are listed in, or known to be eligible for inclusion in, the National Register of Historic Places. A copy of this letter as well as the response is included in Appendix D.



Section 5  
TRAFFIC INFORMATION

Currently, EOG receives approximately four waste delivery trucks each day. When the facility is fully expanded, as proposed in this Feasibility Report and Plan of Operation, it is expected that an average of eight waste delivery trucks will be received each day. These will include van, trailer, trucks carrying waste in drums, tanker trucks carrying bulk organic liquids and pumpable sludges, and bulk solid wastes in Roll-Off Boxes and Lugger-Boxes. Transport will be via vehicles having a gross (loaded) weight of less than 80,000 pounds, similar to those servicing the facility at this time.

There also will be truck traffic from the facility to other facilities to transfer (1) waste receipts which will not be managed at the facility, (2) wastes generated by the facility, and (3) blended fuels for use in the secondary market (i.e. sent to cement kilns). When the facility is fully developed, it is expected that this truck traffic will average up to an additional four trucks per day. These trucks will include (but are not limited to) van, trailer, tank trucks, and Roll-Off/Lugger-Boxes having a gross (loaded) weight less than 80,000 pounds.

Trucks usually reach the facility by traveling either Interstate 43 or U.S. Highway 41/45 (either northbound or southbound) and exiting onto County Route PP (Good Hope Road) and traveling approximately 3 miles westbound to North 60<sup>th</sup> Street from Interstate 43 or traveling approximately 3 miles eastbound from U.S. Highway 41/45. Then turning northbound on North 60<sup>th</sup> Street approximately 1/4 mile to West Hemlock Street. After turning eastbound on West Hemlock Street, traveling approximately 1000 feet to the entrance gate of the facility at the end of the road. Trucks leaving the facility will follow this same route in reverse. U.S. Highway 41/45 and Interstate 43 are both four-lane highways which typically carry heavy truck traffic and which will easily accommodate the facility traffic described above. Good Hope Road is a straight, four-lane road and North 60<sup>th</sup> Street is a two-lane road. According to Mr. Prevschel of the City of Milwaukee, Mapping and Drafting Department, Good Hope Road and North 60th Street are both capable of carrying the traffic described above.

The travel routes to and from the facility are the same as described above. All of the roadways on the facility will be asphalt paved and will be designed and constructed to accommodate vehicles typically received at EOG.





The travel routes to and from the facility are the same as described above. All of the roadways on the facility will be asphalt paved and will be designed and constructed to accommodate vehicles typically received at EOG.

Sheet 8 of 18 shows the principle traffic patterns for the expanded facility. All personnel and visitor vehicle(s) are to be parked in designated parking areas outside of the operating portions of the facility. For the existing facility, waste delivery trucks will enter the facility on the northwestern side of the storage/process building, next to the administrative offices or will back into the sunken loading dock located in the northwest corner of the storage/process building. After confirmation of manifest and shipping papers at the office, the trucks are then directed to proceed to the designated areas for loading/off-loading.

For the expanded facility, waste delivery trucks enter the facility through the main gate located north (rear) of the leased office space. The area north of the lease office space is a paved roadway and parking area. This parking lot area is rarely used by the tenants of the building because sufficient parking space is available in the front of the building. Trucks waiting to enter the facility while multiple loads are being delivered, will be staged within a fenced area located on the EOG property. This area will only be used for truck staging when heavy traffic is experienced at the site loading and unloading facilities and roll-off staging area which are located to the South. The trucks will be attended by their drivers while waiting to load or unload. After confirmation of manifest and shipping papers at the office, the trucks are then directed to proceed to the designated areas for loading/off-loading. After the loads are off-loaded and have been accepted at the facility, the trucks will leave the facility through either the gate located north of the storage process building or the gate north of the sunken loading dock.



## Section 6 GEOLOGY AND HYDROGEOLOGY

The characterization of site geology and hydrogeology will describe the glacially deposited unconsolidated units, which includes topsoil, and the underlying consolidated bedrock. The description of geology and hydrogeology was based on ten driller's logs of nearby water supply wells (within 1.5 miles), the Soil Survey of Milwaukee and Waukesha Counties, Wisconsin and other geologic publications.

### 6.1 Geology

#### 6.1.1 Unconsolidated Strata

The EOG facility is located in an area that has been identified as an end moraine for the Lake Michigan Lobe of the Wisconsin ice advance (Alden 1918). Typical end moraine stratigraphy is composed of relatively high percentages of clay till with low potential for containing large deposits of sand and gravel. As confirmed by driller's logs for the area (Appendix A) this area has a high potential for containing small to moderate deposits of sand and gravel. Generally speaking, the driller's logs show 50 to 125 feet of clay till overlying what the drillers call limestone but which is more likely dolomite.

There are two soil types that have developed in the upper till units in the area. These two soil types are briefly described in the Soil Survey of Milwaukee and Waukesha Counties, Wisconsin:

*Cv, Clayey Lands - Primarily within cities or towns where the entire developed soil layer has been excavated for fill material or has been buried during development of the property. The material in this land type is mainly clay to clay loam that has been compacted which causes much potential of rainfall runoff. The soil type is unfavorable for the growth of plants.*

*OuB, Ozoukee Silt Loam - 2 to 6 percent slopes, well drained to moderately well drained silty soils, moderately slow permeabilities with high available water capacity. Natural fertility is moderate.*

Due to the development of the existing building and rough grading of the expansion area, it is unlikely any of these soil types are present today.



### **6.1.2 Bedrock Stratigraphy**

The generalized cross section for southeastern Wisconsin shows the relationship of the sedimentary bedrock that underlies the till at the site.

Based on the map of the bedrock surface, the descriptions of the formations on the generalized cross section, and the descriptions on the driller's logs, it is believed that the bedrock surface at the facility is the Niagaran age dolomite. Though the site lies near the mapped boundary for the western edge of the younger Devonian Milwaukee formation, the geologic log of the well just east of the facility identifies the bedrock surface to be Niagara dolomite.

The upper part of the Niagara is a massive light gray dolomite. The central part commonly contains some chert and is pink at many places. The lower part is a light gray dolomite which is not as massive as the upper part. The Niagara has a maximum thickness of 477 feet in Northeastern Milwaukee County. An extensive system of joints and other fractures has developed in the Niagara and have been enlarged by solution. Though the openings are not cavernous, they make the very dense dolomite permeable.

## **6.2 Hydrogeology**

### **6.2.1 Pleistocene Deposits (Wisconsin Drift)**

Permeable sand and gravel deposits in or at the base of the glacial drift are capable of providing water in quantities adequate for domestic or farm supply uses. However, there have been no borings at the site to confirm the existence of a water bearing unit of this type. Although the driller's logs of water supply wells show sand, gravel and sand and gravel units at 3 to 13 feet thick, it is not known that these units could produce this quantity of water.

### **6.2.2 Niagara Dolomite**

The Niagara is a dense dolomite that is an inconsistent aquifer. Groundwater occurs along joints and bedding planes in this formation. Solution enlarges these openings especially in the upper part of the formation where the preglacial land surface was exposed. Some wells in the Niagaran in the area can produce as much as 600 gallons a minute where as others only produce enough for domestic use (Foley et.al, 1953).



### **6.2.3 Sandstone Aquifer**

The shallow inconsistent aquifers consisting of the glacial drift of Pleistocene age and the Niagara dolomite of Silurian age are separated from the deeper Cambrian and Ordovician age sandstone aquifer that is most frequently used in the area by 90 to 225 feet of Maquoketa Shale which acts as a confining layer. The sandstone aquifer consists of the St. Peter, Eau Claire and Mt. Simon formations with the St. Peter and Mt. Simon being the most productive formations.

### **6.3 Groundwater and Surface Water Quality**

Groundwater and surface waters in the Milwaukee/Waukesha area have high natural hardness (Holt, 1970). The average total mineral content of groundwater of all aquifers underlying this area is 435 parts per million (ppm). Sulfate levels in some wells exceed the drinking water standard of 250 ppm. Chloride and iron contents are generally low but can be problematic on a local basis. Hardness of groundwater generally increases with depth (Foley, 1953).

### **6.4 Facility Effects on Groundwater and Surface Waters**

Because of the engineered secondary containment around storage and processing areas in both the existing and proposed facilities, the chance of an accidental leak or spill that could escape from the site and enter surface or groundwater is negligible. Such a release incident has not occurred during the history of the existing facility. Further, as described above, there are no significant geological or topographic features on the site. Because the facility has only negligible potential to affect any of the surrounding area, extensive geotechnical data is not relevant to this facility.





Section 7  
TREATMENT AND DISPOSAL FACILITIES

Hazardous wastes from the facility will be transferred off-site for reclamation and/or treatment and disposal at various facilities. In addition, blended fuel products will be sent off-site for use as a secondary fuel for various cement kilns. The off-site cement kiln facilities are described in Table 1 and the off-site reclamation and/or treatment and disposal facilities could include the following:

- Clean Harbors, Chicago, Illinois
- U.S. Pollution Control Inc., Waynoka, Oklahoma
- Wayne Disposal, Belleville, Michigan
- Rollins Environmental Services, Deer Park, Texas
- Pollution Control Industries, East Chicago, Indiana
- Northern States Power, Minneapolis, Minnesota
- Chemical Reclamation Services, Avalon, Texas
- Recyclights, Minneapolis, Minnesota
- PetroChem Processing, Detroit, Michigan
- Environmental Services of America, Inc., South Bend, Indiana
- Salesco, Phoenix, Arizona
- Aptus, Aragonite, Utah
- Battery Disposal Technologies, Clarence, New York
- Chem Met Services, Wyandotte, Michigan
- CyanoKem, Detroit, Michigan
- Chemical Conservation, Orlando, Florida
- Eltex Chemical, Houston, Texas
- Ensco, El Dorado, Arkansas
- Enviropure, McCook, Illinois
- Waste Management-Parkview, Menomonee Falls, Wisconsin
- Research Oil, Cleveland, Ohio

Other approved facilities may also be utilized.



Table 1	
OFF-SITE SECONDARY FUEL SOURCES	
FACILITY	LOCATION(S)
Ash Grove Cement Company	Louisville, Nebraska
Ash Grove Cement Company	Foreman, Arkansas
Ash Grove Cement Company	Chanute, Kansas
Carolina Solite	Albemarle, North Carolina
Continental Cement	Hannibal, Missouri
Dixie Cement Company	Knoxville, Tennessee
Essroc Materials Inc.	Logansport, Indiana
Florida Solite	Green Cove Springs, Florida
Giant Resource Recovery Company	Harleyville, South Carolina
Heartland Cement Company	Independence, Kansas
Holnam Cement	Clarksville, Missouri
Holnam Incorporated	Santec, South Carolina
Kentucky Solite Corporation	Brooks, Kentucky
Keystone Cement Company	Bath, Pennsylvania
Medusa Cement Company	Wampum, Pennsylvania
Lafarge Corporation Systech-Alpena	Alpena, Michigan
Lafarge Corporation	Demopolis, Alabama
Lonestar Industries	Cape Girardeau, Missouri
National Cement Company	LeBee, California
North Texas Cement	Midlothian, Texas
Texas Industries	Midlothian, Texas
River Cement Company	Festus, Missouri
Rhone Poulenc Chemical Company	Hammond, Indiana
Saint Mary's Peerless Cement Company	Detroit, Michigan
Southwestern Portland Cement Company	Bath Township, Ohio



Table 1	
OFF-SITE SECONDARY FUEL SOURCES	
FACILITY	LOCATION(S)
Solite Corporation	Arvonnia, Virginia
Solite Corporation	Cascade, Virginia
Southdown Inc.	Knoxville, Tennessee
Systech	Fredonia, Kansas
Systech	Greencastle, Michigan
Systech	Paulding, Ohio
NOTE: Other approved facilities may also be utilized.	



### 7.1 Material Balance

The majority of the wastes to be received at EOG will include organic listed wastes (F001, F002, F003, F005 and D001) and solid wastes which will be recycled by EOG for re-refining or energy recovery as a fuel for industrial furnaces. Once the operating permit is approved by the WDNR, EOG will have the capacity to store up to 1,189,500 pounds of F001, F002, F003, F005, and D001 wastes. EOG will also accept various Toxicity Characteristic wastes (D-listed wastes); hazardous wastes from non-specific sources (F-listed wastes); hazardous wastes from specific sources (K-listed wastes); various discarded commercial chemical products, off-specification species, container residues, spill residues, etc. (P-listed and U-listed wastes) for bulking and transport for off-site metal recovery, neutralization, etc. Polychlorinated Biphenyl (PCB) wastes and gases stored in cylinders will be accepted at EOG for storage only. Once truckload quantities of these wastes have been accumulated, EOG will send these materials to a permitted facility for treatment and disposal.

Wastes generated by EOG will include primarily solid wastes (i.e., containers not suitable for reclamation, office waste, etc.). Examples of material balance at this facility are as follows:

#### Scenario 1

EOG receives a lab pack containing the following chemicals:

Sulfuric Acid	1 pint	D002
Phosphoric Acid	1/2 gallon	D002
Hydrochloric Acid	1 quart	D002
Nitric Acid Solution 40 %	1 quart	D002
Chromic Acid Solution	4 oz.	D002, D007
Hydrofluoric Acid	1 pint	D002

All of these items will be depacked and consolidated into the acid tank. Any items that are received in a lab pack that could not be bulked would be repacked and sent to an off-site disposal facility for





disposal. The containers would be triple rinsed with the rinse water going into the acid tank. The glass jars would then be crushed and sent to a glass reclaimer.

Scenario 2

EOG receives 55-gallon drums of acetone from an industrial client which carries the EPA waste codes D001 and F003. These drums are pumped into one of the bulk fuel tanks. When the materials from this tank ship off-site, the manifest will carry the D001 and F003 codes as well as any other codes from material bulked into this tank. The RCRA empty drums will be sent off-site to a drum reclaimer.

Scenario 3

EOG receives a lab pack containing the following chemicals:

Acetone	1 pint	D001, F003
Hexane	1 quart	D001, F005
Toluene	1 pint	D001, F005
Allyl Alcohol	2x1 pint	D001, P005
Hexachlorobenzene	1/2 pound	U127, D032
Methylene Chloride	1 quart	F002
Phenol	1 pound	U188
Methyl Ethyl Ketone	1/2 gallon	D001, F005, D035
Methanol	2x1 quart	D001, F003
Pyridine	1 pint	D001, F003, D038

All of these items will be depacked and consolidated for fuel. All of the waste codes will be retained through the bulking process. When the materials ship off-site, the manifest will carry all waste codes. The containers would be triple rinsed with the rinse water going into the fuel. The glass jars would then be crushed and sent to a glass reclaimer.



Section 8  
**CONSTRUCTION TIMETABLE**

The Container Storage Unit and the solids removal operation have already been constructed and are in use. Additional container storage capacity, blending operations, bulk solid and liquid storage areas and lab-repackaging operations and buildings will be scheduled based upon business requirements. Prior to any construction activities of the above structures, EOG will construct the 6-foot high perimeter fence. Construction of the above items is expected to be done using a phased approach and is expected to be completed in 12 to 36 months. EOG will complete their facility construction in the following phases:

- Phase I:        Retrofit the existing building at 5611 West Hemlock Street to meet permit requirements for storage of hazardous wastes.
- Phase II:       Construction of the Lab Pack Depack building.
- Phase III:      Construction of the tank farm.

All necessary security and safety issues associated with each Phase will be self contained. For example, the facility fence and security system will be constructed during Phase I. Henry Krier of EOG will be the primary person responsible for site construction. Megal Corporation will also be involved with the site construction activities.



**Section 9**  
**OPERATING SCHEDULE**

EOG currently operates 9 hours per day, 8:00 a.m. to 5:00 p.m., weekdays only. However, the facility may operate longer hours and/or weekends as required to meet business needs.



Section 10

ENVIRONMENTAL IMPACT DISCUSSION

The most direct means of recycling is by re-directing unwanted products to people who can use them. Companies often buy too much of a certain product or change their manufacturing process and no longer need that product. Used oil and other recyclable materials eventually become so old that they are unusable for their intended purposes. It is time consuming and costly for a company to individually find a user outside of their organization for these unwanted or off-spec products. These companies usually find that disposal of these small quantities of unwanted products is much more cost effective. EOG has nationwide contacts with industries which have specific product needs and any of these unwanted products can fulfill the needs of these other users.

Some materials simply cannot be recycled because they either have no reclamation value or a user cannot be located within a reasonable amount of time. In these cases, fortunately, the recycling process is not limited to reuse. These waste materials can become resources for "co-processing". Co-processing is any manufacturing process which uses waste materials in either a single or combined operation to produce a product. Cement manufacturing is one of the largest co-processing industries. Organic liquid wastes replace nonrenewable fossil fuels as the energy source for kiln operation. Wastewaters are used for cooling and make-up water in the cement making process. Wastes used in co-processing not only contribute to the production of an essential product, but conserve natural resources. Co-processing has been hailed by the EPA as one of the most viable waste recycling technologies in existence today.

The presence of EOG is of great benefit to industries and institutional, municipal, and commercial establishments in the State of Wisconsin in that it provides an acceptable and efficient means of managing the hazardous wastes that are an unavoidable byproduct of many industrial and commercial operations. The recent extension of the RCRA hazardous waste regulations to now include "small generators", in addition to heavy industries that were primarily regulated, and the accumulation of household hazardous wastes, magnifies the need for the subject facility. EOG also





enhances the welfare of the people and environment of the State of Wisconsin as a whole by providing a proper means of managing such hazardous wastes and thereby lessening the likelihood of random, improper, or illicit disposal of such wastes within the state.

#### **10.1 Physical Impacts**

Both the existing and proposed facilities have minimal physical impact on the population and environment of the surrounding area.

During normal operations of the existing facility the potential exists for minimal amounts of volatile organic compounds (VOCs) to be released from drums when they are opened briefly for sampling. However, in the expanded facility, when drums are processed, or when volatile liquids are blended and/or stored in tanks, both the process and storage units will be vented through appropriate air pollution control devices to limit emissions to regulatory levels. A construction air permit has been prepared for a new, non part 70 source (minor source) and is included as part of this Application. Major truck parking and maneuvering areas are paved, and such dust generation on the site will be minimal from vehicle movement.

It is possible for accidental leaks or spills to have an adverse impact upon facility operations; however, extensive physical barriers, such as engineered secondary containment structures, and operational barriers, such as the precautionary procedures described in the Training Plan, Preparedness and Prevention Plan and Inspection Schedule, reduce the possibility of such adverse impacts. The effectiveness of these procedures have been demonstrated by the absence of such accidental adverse impacts during the past years of operation of the existing facility.

#### **10.2 Resource Commitments**

There are no irreversible commitments of resources to the existing or expanded facility. All facility equipment and buildings, could be salvaged for other uses. No land zoning changes are known to be



required and the land itself could be returned to its natural state by the removal of all structures, including foundations, from the site.

### **10.3 Alternatives to the Project**

The main alternative to the expanded facility would be to construct another facility at a different site with equivalent capacity. However, the history of EOG demonstrates the need for such a facility in the area. Continued operation, and expansion, of the present facility is the most reasonable and economical way of addressing demonstrated and anticipated need with minimum environmental impact.

### **10.4 Effects of the Project**

Direct effects upon the community of the existing and proposed facilities are minimal, as discussed above. The indirect effects are even less. There will be a slight increase in traffic flow on the roadways used as the access route because of the size of proposed facility compared to that of the existing facility, but this increase will be imperceptible. No cumulative effects are anticipated from the existing or proposed projects.

EOG does not believe that the facility will affect any known recreational, historic, or archeological areas. Mr. Charles M. Pils of the Wisconsin DNR Bureau of Endangered Resources communicated that no officially designated stretches of wild or scenic rivers or officially designated critical habitats are in the area of the site (see Subsection 4.3). In addition, Mr. Richard W. Dexter of the State Historical Society of Wisconsin indicated that there are no registered historical sites nor are there any known archeological site in the area of the site (see Subsection 4.5).

### **10.5 Environmental Review**

An environmental review which addresses the requirements found in WAC NR 680.06(6) is included in Appendix E. It has been written so as to stand alone in its description of the facility, the physical characteristics of its location and the effects the construction and operation may have on the environment around it.



**Section 11**  
**REFERENCES**

- Alden, William C., 1918. The Quaternary Geology of Southeastern Wisconsin, United States Geological Survey, Professional Paper 106.
- Cherkauer, Douglas S. et.al., 1977. Geology of Southeastern Wisconsin, A guidebook for the 41st Annual Tri-State field Conference, Wisconsin State Geologic and Natural History Survey.
- Foley, F.C., W.C. Walton and W.J. Drescher, 1953. Groundwater Conditions in the Milwaukee-Waukesha Area Wisconsin, Geological Survey Water Supply Paper 1229, United States Government Printing Office, Washington.
- Holt, C.L.F., Jr., 1970. Field Trip Guidebook to the Hydrogeology of the Rock-Fox River Basin of Southeastern Wisconsin, Geological Society of America.
- Southeast Wisconsin Regional Planning Commission, 1980. A Regional Air Quality Attainment and Maintenance Plan for Southeastern Wisconsin: 2000, Southeastern Wisconsin Regional Planning Commission.

